

# **Exhibit 47, Part 5**

## Bruce Dubinsky

### Certifications

- Certified Public Accountant, State of Maryland, 1985
- Certified Public Accountant, State of Florida, 2021
- Certified Fraud Examiner, 1998
- Certified Valuation Analyst, 1998
- Master Analyst in Financial Forensics, 2008
- Certified in Financial Forensics, 2010
- Commercial Arbitrator, 2002-2004
- Registered Investment Advisor Representative (former), 1999-2008
- Certified Anti-Money Laundering Specialist, 2017

### Education

- Master of Science in Taxation, (high honors), Georgetown University, Washington, D.C., 1986
- Bachelor of Science in Accounting, University of Maryland, 1983
- Various Continuing Education Courses

## Bruce Dubinsky

### Other

- Advisory Council for the Center for the Study of Business Ethics, Regulation and Crime (C-BERC) at the Smith School of Business, University of Maryland.
- Advisory Board - LexisNexis Fraud Defense Network
- Chairman Emeritus of the Board of Regents for the Association of Certified Fraud Examiners
- Association of Certified Fraud Examiners Board of Regents
- Instructor of Exceptional Distinction Award- NACVA
- Named one of the "Top 100 Most Influential People in the Accounting Profession" by Accounting Today
- Fraud Examiner of the Year - Washington Metropolitan Chapter of Certified Fraud
- Former member of the Editorial Board of The Value Examiner
- Former contributing editor for the CPA Digest
- Frequent media appearances in numerous print media as well as appearing on local and national television and radio newscasts, to discuss various tax, accounting and fraud issues.
- Bruce frequently lectures at the college level on issues relating to forensic accounting and accounting ethics. He has presented seminars to law firms, professional groups and law enforcement bodies, including the Federal Bureau of Investigation.



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<p><b><u>Prezzano, et al. v. Credit Suisse Securities (USA) LLC</u></b>          FINRA Arbitration – Chicago, IL          Case No. 19-02974          September 21-22, 2021 (Trial)</p>	<p><b><u>Hutchinson, et al. v. Credit Suisse Securities (USA) LLC</u></b>          FINRA Arbitration – Chicago, IL          Case No. 16-02825          February 22-23, 2021 (Trial)</p>
<p><b><u>In re Bernard L. Madoff, Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernie L. Madoff v. BAM L.P., Michael Mann and Meryl Mann</u></b>          U.S. Bankruptcy Court Securities Investor Protection Corporation – Southern District of New York          Adv. Pro. No. 08-01789 (SMB)          SIPA LIQUIDATION (Substantively Consolidated)          Adv. Pro. No. 10-04390 (SMB)          September 14, 2020 (Trial)</p>	<p><b><u>Jefferies LLC v. Jonathan Moneypenny</u></b>          FINRA Arbitration – New York, NY          Case No. 17-01229          February 25-26, 2020 (Trial)</p>
<p><b><u>Galli, et al. v. Credit Suisse Securities (USA) LLC</u></b>          FINRA Arbitration – Boston, MA          Case No. 17-01489          January 22, 2020 (Trial)</p>	<p><b><u>Jefferies LLC v. Jerald E. Slowik</u></b>          FINRA Arbitration – New York, NY          Case No. 18-00548          January 15-16, 2020 (Trial)</p>
<p><b><u>City of Almaty, Kazakhstan and BTA Bank JSC v. Mukhtar Ablyazov, Viktor Khrapunov, Ilyas Khrapunov, and Triadou SPV S.A.</u></b>          U.S. District Court – Southern District of New York          Case No. 15-cv-05345-AJN          August 21, 2019 (Deposition)</p>	<p><b><u>Firstman, et al. v. Credit Suisse Securities (USA) LLC</u></b>          FINRA Arbitration – Atlanta, GA          Case No. 17-01632          July 18, 2019 (Trial)</p>
<p><b><u>Dertouzos v. Credit Suisse Securities (USA) LLC</u></b>          FINRA Arbitration – New York, NY          Case No. 16-02848          July 3, 2019 (Trial)</p>	<p><b><u>Credit Suisse Securities (USA) LLC v. Zinman</u></b>          FINRA Arbitration – New York, NY          Case No. 16-03093          June 20-21, 2019 (Trial)</p>



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<p><b><u>In re Bernard L. Madoff, Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff v. Carol Nelson &amp; Stanley Nelson</u></b></p> <p>U.S. Bankruptcy Court – Southern District of New York  Adv. Pro. No. 08-01789 (SMB)  SIPA LIQUIDATION (Substantively Consolidated)  Adv. Pro. No. 10-04658 (SMB)  Adv. Pro. No. 10-04377 (SMB)  May 8, 2019 (Trial)</p>	<p><b><u>DellaRusso and Sullivan v. Credit Suisse Securities (USA) LLC</u></b>  FINRA Arbitration – New York, NY  Case No. 17-01406  April 15-16, 2019 (Trial)</p>
<p><b><u>David Greene v. Credit Suisse Securities (USA) LLC</u></b>  FINRA Arbitration – Atlanta, GA  Case No. 17-00112  February 20, 2019 (Trial)</p>	<p><b><u>Jefferies LLC v. Jon A. Gegenheimer</u></b>  FINRA Arbitration – San Francisco, CA  Case No. 16-02461  January 31, 2019 (Trial)</p>
<p><b><u>Nicholas Finn v. Credit Suisse Securities (USA) LLC</u></b>  FINRA Arbitration – New York, NY  Case No. 17-01277  October 18, 2018 (Trial)</p>	<p><b><u>Micro Focus (US), Inc. v. Express Scripts, Inc.</u></b>  United States District Court for the Northern District of Maryland – Greenbelt Division  Civil Action No. 8:16-cv-00971  August 29, 2018 (Deposition)</p>
<p><b><u>Concordia Pharmaceuticals Inc., S.A.R.L. v. Winder Laboratories, LLC and Steven Pressman</u></b>  United States District Court for the Northern District of Georgia – Gainesville Division  C.A. No. 2:16-cv-00004-RWS  April 5, 2018 (Deposition)</p>	<p><b><u>Harold W. Nix et. al v. United States of America</u></b>  United States District Court, Eastern District of Texas  Case No. 2:17-cv-434 (Lead); 2:17-cv-435; 2:17-cv-436  March 1, 2018 (Deposition)</p>
<p><b><u>Brian M. Chilton v. Credit Suisse Securities (USA) LLC</u></b>  FINRA Arbitration – Boston, MA  Case No. 16-03065  August 6, 2018 (Trial)</p>	<p><b><u>Certain Underwriters at Lloyd's, London, et al. v. National Railroad Passenger Corporation, et. al.</u></b>  United State District Court - Eastern District of New York  ECF Case 14 Viv. 4717  September 20, 2017 (Trial)  May 16, 2017 (Deposition)</p>



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<p><b><u>In re Samuel E. Wyly, et al.,</u></b>  <b><u>Evan A. Wyly and Lisa L. Wyly v. Samuel E. Wyly</u></b>  <b><u>and the Internal Revenue Service v. Evan A. Wyly,</u></b>  <b><u>Lisa L. Wyly, and Samuel E. Wyly</u></b>  U.S. Bankruptcy Court – Northern District of Texas  – Dallas Division  Case No. 14-35043-BJH  Adversary No. 17-03013  March 14, 2018 (Deposition)</p>	<p><b><u>John K. Dema, P.C. v. Government of the US Virgin Islands,</u></b>  Matter in Arbitration – St. Croix, US Virgin Islands  September 14, 2016 (Trial)</p>
<p><b><u>Mark Hale, Todd Shadle and Carly Vickers Morse v. State Farm Mutual Automobile Insurance Company, Ed Murnane and William G. Shepherd</u></b>  United States District Court – Southern District of Illinois  Case No. 3:12-CV-00660-DRH-SCW  November 22, 2017 (Deposition)</p>	<p><b><u>Wyle Inc. and Wyle Services Corp., v. ITT Corp., Exelis Inc., and Xylem Inc.</u></b>  Supreme Court of the State of New York-  County of New York  Case No. 653465/2011  March 24, 2016 (Deposition)</p>
<p><b><u>United States of America v. Robert Schulman</u></b>  United States District Court - Eastern District of New York  Case No. 16-CR-442 (JMA)  March 10 &amp; 13, 2017 (Trial)</p>	<p><b><u>In re: Samuel E. Wyly, et al.</u></b>  U.S. Bankruptcy Court-Northern District of Texas  Case No. 14-35043-(BJH)  January 20-21, 2016 (Trial)  January 5, 2016 (Hearing-Daubert Motion)  November 19, 2015(Deposition)</p>
<p><b><u>United States of America v. Duane Crithfield and Stephen Donaldson, Sr.</u></b>  United States District Court – Middle District of Florida – Tampa Division  Case No. 8:13-CR-237-T-23TBM  June 16-17, 20, 2016 (Trial)</p>	<p><b><u>In re Bernard L. Madoff Investment Securities LLC</u></b>  <b><u>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. J. Ezra Merkin, et al.</u></b>  U.S. Bankruptcy Court - Southern District of New York  Adv. Pro. No. 08-01789 (SMB)  SIPA LIQUIDATION (Substantively Consolidated)  Adv. Pro. No. 09-01182 (SMB)  April 27, 2015 (Deposition)</p>



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<p><b><u>Al Kellerman, et al. v. Marion Bass Securities Corporation et al.</u></b>  Circuit Court for Madison County, Illinois  Cause No. 01-L 000457  February 18, 2016 (Deposition)</p>	<p><b><u>Walpart Trust Reg, Trustee of the Acconci Trust, on behalf of Lincolnshire Equity Partners, L.P. and American National Insurance Company on behalf of Lincolnshire Equity Fund, L.P. v. Thomas J. Maloney, Lincolnshire Management, Inc. and Lincolnshire Equity, Inc.</u></b>  Supreme Court of the State of New York-  County of New York  Case No. 651096/2011  October 9, 2014 (Deposition)</p>
<p><b><u>Department of Enforcement v. Paul E. Taboada</u></b>  Financial Industry Regulatory Authority Office of Hearing Office  Disciplinary Proceeding No. 2012034719701  October 5, 2015 (Trial)</p>	<p><b><u>United States of America v. Daniel Bonventre, Annette Bongiorno, Joann Crupi a/k/a "Jodi," Jerome O'Hara, and George Perez (Madoff criminal case)</u></b>  United States District Court – Southern District of New York  Case No. S10 10 Cr. 228 (LTS)  October 24, 28-30, 2013 (Trial)</p>
<p><b><u>In re Bernard L. Madoff Investment Securities LLC</u></b>  <b><u>Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Andrew H. Cohen</u></b>  U.S. Bankruptcy Court - Southern District of New York  Adv. Pro. No. 08-01789 (SMB)  SIPA LIQUIDATION (Substantively Consolidated)  Adv. Pro. No. 10-04311(SMB)  October 14, 2015 (Trial)</p>	<p><b><u>Christopher Cohan, individually and as sole Trustee of the Christopher Cohan Separate Property Trust, and Angelina Cohan v. KPMG LLP</u></b>  State Court of Fulton County – State of Georgia  Civil Action No. 12EV0114325G  July 3, 2013 (Deposition)</p>
<p><b><u>Spentex Netherlands, B.V. v. Republic of Uzbekistan</u></b>  International Centre for Settlement of Investment Disputes  ICSID Case No.: ARB/13/26  September 24, 2015 (Trial)</p>	<p><b><u>Eagle Materials, Inc. v. United States of America</u></b>  United States District Court for the Northern District of Texas  Civil Action No. 3:11-CV-00936-F  January 29, 2013 (Deposition)</p>



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<p><b><u>National Railroad Passenger Corporation v. Ace Bermuda Insurance Ltd., et al.</u></b>          United States District Court – Southern District of New York          Civil Action No.: 14-cv-7510 (JSR)          February 25, 2015 (Deposition)</p>	<p><b><u>In re Bernard L. Madoff Investment Securities LLC Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC v. Saul B. Katz, et al.</u></b>          U.S. District Court for the Southern District of New York          Adv. Pro. No. 08-01789 (BRL)          SIPA LIQUIDATION (Substantively Consolidated)          Adv. Pro. No. 10-5287 (BRL)          11-CV-03605 (JSR) (HBP)          January 11, 2012 (Deposition)</p>
<p><b><u>The People of the State of New York by Andrew M. Cuomo, Attorney General of the State of New York, against Bank of America Corporation, Kenneth D. Lewis and Joseph L. Price</u></b>          Supreme Court of the State of New York – County of New York          Case No. 450115/2010          January 29, 2014 (Deposition)</p>	<p><b><u>Estate of Elizabeth S. Snow, Deceased, Philip F. Brown, Executor v. United States of America</u></b>          U.S. District Court of Washington at Tacoma          Case No. 3:10-cv-05793-RBL          October 27, 2011 (Deposition)</p>
<p><b><u>First Technology, Inc., v. Siemens Energy, Inc.</u></b>          American Arbitration Association – Orlando Division          Case No. 50-198-T-00200-12          August 20, 2013 (Trial)</p>	<p><b><u>Glynn v. EDO Corporation</u></b>          U.S. District Court for the District of Maryland          Case No. 1:07-cv-01660-JFM          February 25, 2011 (Deposition)</p>
<p><b><u>Thomas &amp; Kidd Oil Production, Ltd. v. United States of America</u></b>          United States District Court for the Northern District of Texas – Lubbock Division          Case No.: 5:10-CV-00108-C (consolidated with 5:10-CV-110-C, 5L10-CV-111-C, and 5:10-CV-161-C)          March 27 &amp; 28, 2013 (Trial)          December 6, 2012 (Deposition)</p>	<p><b><u>Perot Systems Government Services, Inc. v. 21st Century Systems, Inc. et al.</u></b>          Circuit Court for Fairfax County, Virginia          Case No. 2009-08867          June 22, 2010 (Trial)          May 28, 2010 (Deposition)</p>
<p><b><u>Department of Enforcement v. William B. Fretz, Jr. (CRD 1545760), John P. Freeman (CRD 1651569), and the Keystone Equities Group(CRD 127529)</u></b>          Financial Industry Regulatory Authority - Office of Hearing Officers          Disciplinary Proceeding No. 2010024889501          July 11 and 12, 2012 (Live Hearing)</p>	<p><b><u>Sands Capital Management, LLC v. Scott E. O'Gorman</u></b>          American Arbitration Association          Case No. 16 148 Y 00459 09          April 28, 2010 (Trial)</p>



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<p><b><u>South Florida Physician's Network, LLC and United Health Networks, Inc. and United Health Network of Florida, Inc.</u></b></p> <p>American Arbitration Association Case No. 32 193 Y 00567 10 December 14, 2011 (Trial) August 11, 2011 (Deposition)</p>	<p><b><u>HCP Laguna Creek CA et al v. Sunrise Senior Living Management, Inc.</u></b></p> <p>U.S. District Court for the District of Eastern Virginia Case No: 1:09 CV 824-GBL/JFA February 26, 2010 (Deposition)</p>
<p><b><u>Clay Vance Richardson et al v. Frontier Spinning Mills Inc. et al.</u></b></p> <p>General Court of Justice Superior Court, North Carolina Case No: 10 CVS 1040 June 3, 2011 (Deposition)</p>	<p><b><u>In re UnitedHealth Group, et al. v. American Multispecialty Group d/b/a/ Esse Health</u></b></p> <p>American Arbitration Association Case No. 57 193 Y 00004 08 June 9 &amp; 10, 2009 (Trial) April 24, 2009 (Deposition)</p>
<p><b><u>HCP et al v. Sunrise Senior Living Management, Inc. et al.</u></b></p> <p>Court of Chancery of the State of Delaware Case Nos. 4691-VCS; 4692-VCS; 4693-VCS; 4694-VCS; 4696-VCS; 4697-VCS; 4698-VCS; 4699-VCS July 21, 2010 (Deposition)</p>	<p><b><u>Southgate Master Fund v. United States</u></b></p> <p>U.S. District Court for the Northern District of Texas – Dallas Division Case No: 3:06-CV-2335-K January 14-15, 2009 (Trial) September 17, 2008 (Deposition)</p>
<p><b><u>ClassicStar Mare Lease Litigation</u></b> <b><u>James D. Lyon, Chapter 7 Trustee of ClassicStar, LLC v. Tony P. Ferguson et al.</u></b></p> <p>U.S. District Court Eastern District of Kentucky, Lexington MDL No. 1877; Civil Action No. 5:07-cv0353-JMH and 5:09-215-JMH May 13, 2010 (Deposition)</p>	<p><b><u>Hoehn Family, LLC v. Price Waterhouse Coopers, LLC</u></b></p> <p>Circuit Court of Jackson County Missouri at Independence Case No: 0516-CV36227 September 3, 2008 (Deposition)</p>
<p><b><u>Bemont Investments LLC v. United States</u></b></p> <p>United States District Court for the Eastern District of Texas-Sherman Division Case No: 4:07cv9 &amp; 4:07cv10 March 25, 2010 (Trial) August 28, 2009 (Deposition) June 24, 2008 (Deposition)</p>	<p><b><u>Calomiris v. Tompros, et al.</u></b></p> <p>Superior Court for the District of Columbia Case No: ADM 2000-2175-00 January 17, 2008 (Trial)</p>
<p><b><u>Global Express Money Orders, Inc. v. Farmers &amp; Merchants Bank et al</u></b></p> <p>Circuit Court for Baltimore City Case No: 24-C-08-004896 OT January 13, 19 &amp; 25, 2010 (Deposition)</p>	<p><b><u>Rosenbach et al. v. KPMG, LLP et al.</u></b></p> <p>American Arbitration Association Case No: 13 181 Y 00437 06 October 22, 2007 (Trial)</p>



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<p><b><u>Wills Family Trust v. Martin K. Alloy et al.</u></b>  Circuit Court for Montgomery County, Maryland  Case Nos: 252430-V &amp; 2722511-V  June 1 &amp; 2, 2009 (Trial)  Judge Ronald B. Rubin  April 10, 2009 (Deposition)</p>	<p><b><u>Autoscribe Corp. v. 9801 Washingtonian Office, Inc. et al.</u></b>  Circuit Court for Montgomery County, Maryland  Civil Action: Case No. 274847  September 11, 2007 (Deposition)</p>
<p><b><u>Elize T. Meijer and Marcel Windt, Trustees in the Bankruptcy for KPNQwest, N.V. and Global Telesystems v. H. Brian Thompson</u></b>  U.S. District Court for the Eastern District of Virginia – Alexandria Division  Case No: 1:08CV673  December 2, 2008 (Deposition)</p>	<p><b><u>Jerald M. Spilsbury et al. v. KPMG, LLP et al.</u></b>  District Court, Clark County, Nevada  Civil Action: Case No: A479003  July 12, 2007 (Deposition)</p>
<p><b><u>World-Wide Network Services, LLC, et al. v. DynCorp, Inc. and EDO Corp.</u></b>  United States District Court for the Eastern District of Virginia  Case No:1:07-cv-00627-GBL-BRP  January 24, 2008 (Deposition)</p>	<p><b><u>Michael J. Sullivan and Jill P. Sullivan v. KPMG LLP and QA Investments LLC</u></b>  Superior Court of New Jersey Law Division, Monmouth County  Civil Action, Docket No.: MON-L-4279-04  November 30, 2006 &amp; December 12, 2006 (Deposition)</p>
<p><b><u>Harslem et al. v. Ernst &amp; Young, LLP</u></b>  American Arbitration Association  Case No: 30 107 Y 00303 06  November 6 &amp; 7, 2007 (Trial)</p>	<p><b><u>Robert K. Cohen, et al. v. KPMG, L.L.P., et al.</u></b>  State Court of Fulton County, Georgia  Case No. 2003VS060471  May 23, 2006 (Deposition)</p>
<p><b><u>United States v. Timothy D. Naegele, Defendant</u></b>  U.S. District Court for the District of Columbia  Criminal Action: Case No. 05-0151 (PLF)  September 24 &amp; 25, 2007 (Trial);  January 9, 2007 and January 10, 2007 (Daubert Testimony)</p>	<p><b><u>Estate of Keith R. Fetridge v. Aronson &amp; Company, A Professional Corporation</u></b>  Circuit Court for Montgomery County, Maryland  Case No. 256856  Judge Eric Johnson  March 9, 2006 (Trial)</p>
<p><b><u>In re Parmalat Securities Litigation</u></b>  U.S. District Court for the Southern District of New York  Civil Action: Case No. 04 MD 1653 (LAK)  August 22-24, 2007 (Deposition)</p>	<p><b><u>William C. Eacho III &amp; Donna Eacho v. KPMG, LLP et al.</u></b>  Superior Court for the District of Columbia  Case No. 04-005746  November 29 &amp; December 1, 2005 (Deposition)</p>



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<p><b><u>John E. Gallus et al. v. Ameriprise Financial, Inc.</u></b>            United States District Court, District of Minnesota            Civil Action, Docket No.: 0:04-cv-4498            January 23, 2007 (Deposition)</p>	<p><b><u>Lawrence L. Gaslow v. KPMG et al.</u></b>            Supreme Court of The State of New York            County of New York            Case No. 600771/04            August 8, July 1, and June 30, 2005 (Deposition)</p>
<p><b><u>In Re: Estate of First Pay, Inc.; Bankruptcy No. 03-30102-PM</u></b>            United States Bankruptcy Court – District of Maryland (Greenbelt Division)            Michael G. Wolff v. United States of America: Adversary No 05-1700-PM            Judge Mannes            August 9, 2006 (Trial)</p>	<p><b><u>Joseph J. Jacoboni v. KPMG LLP</u></b>            United States District Court for the Middle District of Florida – Orlando Division            Case No. 6:02-CV-510-Orl-22DAB(M.D.Fla.)            May 4, 2005 (Deposition)</p>
<p><b><u>Riddle Farm Financial Limited Partnership v. Route 50 Partners, LP and Worcester Partners, LP and Riddle Farm Associates, LP and Goodwin H. Taylor, Jr.</u></b>            Circuit Court for Worcester County, Maryland            Case No. 23-C-03-0913            April 4 &amp; 5, 2006 (Trial)            February 3, 2006 (Deposition)            May 16, 2005 (Hearing)</p>	<p><b><u>James, LTD. v. Saks Fifth Avenue, et al.</u></b>            Circuit Court for Arlington County, Virginia            Chancery No. 03-802            January 12 and 25, 2005 (Trial)            December 10, 2004 (Deposition)</p>
<p><b><u>Tolt Ventures, L.L.C., et al. v. KPMG, LLP et al.</u></b>            District Court of Harris County, Texas, 333rd Judicial District            Cause No. 2003-69957            January 27, 2006 (Deposition)</p>	<p><b><u>Todd Roy Earl Bentley III v. Deutsche Post Global Mail, LTD</u></b>            Superior Court of The State of California For The County of Los Angeles            Case No: BC 293389            September 23, 2004 &amp; September 14, 2004 (Deposition)</p>
<p><b><u>Richard W. Coleman, Jr. v. KPMG et al.</u></b>            Matter in Arbitration by Agreement of the Parties            October 31-November 2, 2005 (Trial)            October 17-19, 2005 (Trial)            August 22, 2005 (Deposition)</p>	<p><b><u>Ruben A. Perez, et al v. KPMG LLP, et al</u></b>            92<sup>nd</sup> Judicial District Court            Hidalgo County, Texas            Cause No: C-2593-02-A            November 7, 2003 (Deposition)</p>



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<p><b><u>Minebea Co., Ltd, Precision Motors Deutsche Minebea GmbH, and Nippon Miniature Bearing Corp. v. George Papst, Papst Licensing GmbH, and Verwaltungsgesellschaft MIT Beschränkter Haftung</u></b></p> <p>U.S. District Court for the District of Columbia Case No. 97-05-90 (SSH) (DAR) August 4 &amp; 5, 2005 (Trial); June 2, 2005 (Hearing) May 11, 2005 (Deposition)</p>	<p><b><u>Semtek International, Inc. v. Lockheed Martin Corporation</u></b> Circuit Court for Baltimore City, Maryland Case No. 97183023/CC 3762 September 30 – October 1, 2003 (Trial) June 17, 2003 &amp; May 27, 2003 (Deposition)</p>
<p><b><u>Hemanth Rao, et al. v. H-QUOTIENT, Inc., Douglas A. Cohn, and Laurence Burden</u></b> United States District Court for the District of Virginia- <i>Eastern District</i> February 10 and 11, 2005 (Trial)</p>	<p><b><u>Midland Credit v. MBNA America Bank</u></b> Superior Court State Of Arizona, County Of Maricopa Case No. CV2001-002497 February 27, 2003 &amp; November 26, 2002 (Deposition)</p>
<p><b><u>Sensormatic Security Corp. v. Sensormatic Electronics Corporation, ADT Security Services, Inc., &amp; Wallace Computer Services, Inc.</u></b> United States District Court for the District of Maryland <i>Southern Division</i> Case No. 02-Civ-1565 (DKC) September 28, 2004, February 19, 2004 &amp; October 24, 2003 (Deposition)</p>	<p><b><u>Surface Joint Venture v. E.I. Dupont De Nemours &amp; Company, Inc.</u></b> United States District Court For The Western District Of Texas, Austin Division Civil Action No. A 02CA 04 3SS January 3, 2003 (Deposition)</p>
<p><b><u>Alex Alikhani v. System Engineering International, Inc.</u></b> American Arbitration Association No. 16 168 00611 03 August 31, 2004 (Trial)</p>	<p><b><u>Phil Adams Company Profit Sharing Plan v. Trautman Wasserman, Inc.</u></b> &amp; CIBC Oppenheimer, Inc. NASD Arbitration, Washington, D.C. May 22, 2002 (Trial)</p>
<p><b><u>Joseph J. Jacoboni v. KPMG LLP</u></b> United States District Court for the Middle District Of Florida <i>Orlando Division</i> Case No. 6:02-CV-510-Orl-22DAB (M.D.Fla.) October 15, 2003 (Deposition)</p>	<p><b><u>Frank A. Pietranton, Jr. et al. v. Kenneth J. Mahon &amp; Mahon, Inc.</u></b> Circuit Court of Arlington County, Virginia Chancery No. 00-617 Judge Benjamin NA Kendrick February 13, 2002 (Trial)</p>
<p><b><u>Jordan v. Washington Mutual Bank, F.A.</u></b> United States District Court, District of Maryland Case No. H02CV1465 March 12, 2003 (Deposition)</p>	<p><b><u>Amtote International, Inc., v. Bally's of Maryland, Inc.</u></b> Circuit Court for Baltimore County, Maryland Civ. No. 03-C-01-001715 October 19, 2001 (Deposition)</p>



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<p><b><u>Epstein v. Epstein</u></b>  Circuit Court for Montgomery County, Maryland  Family law No: 21608  January 8, 2003 (Trial)</p>	<p><b><u>In Re: Robert S. Beale, Jr.</u></b>  <b><u>In Re: Robert S. Beale, Jr., M.D., P.A.</u></b>  United States Bankruptcy Court – District of Maryland (Baltimore Division)  Case Nos: 99-65815-ESD; 00-55731-ESD  Judge E. Stephen Derby  August 2, 2001 (Trial)</p>
<p><b><u>Cates v. Cates</u></b>  Circuit Court of Fairfax County, Virginia  Chancery No 176170  June 17, 2002 (Deposition)</p>	<p><b><u>Diamond v. Diamond</u></b>  Circuit Court of Fairfax County, Virginia  Chancery No. 165804  Judge M. Langhorne Keith  February 6, 2001 (Trial)</p>
<p><b><u>Boryczka, et al. v. Phil Collyer v. Apex Data Services, Inc.</u></b>  Circuit Court of Fairfax County, Virginia  Chancery No 171437  March 12, 2002 (Deposition)</p>	<p><b><u>Bell Atlantic-Maryland, Inc. v. Furguson Trenching Company, Inc. et al.</u></b>  Circuit Court for Anne Arundel County, Maryland  Case No. C-98-498130C  Judge Michael Looney  November 1, 2000 (Trial)</p>
<p><b><u>Rinearson v. Rinearson</u></b>  Circuit Court of Fairfax County, Virginia  Chancery No. 170354  Judge Robert Wooldridge, Jr.  January 24, 2002 (Trial)</p>	<p><b><u>United States of America v. Lawrence Edwin Crumbliss</u></b>  United States District Court, Eastern District of North Carolina, Western Division  Criminal Case No: 5:99-CR-24-BR  Judge Britt  July 21, 2000 (Trial)</p>
<p><b><u>America Online, Inc., v. Netvision Audiotext, Inc. et al.</u></b>  United States District Court- Eastern District of Virginia  Case No 99-1186-A  October 16, 2001 (Deposition)</p>	<p><b><u>Kontzias v. CVS, Inc.</u></b>  Circuit Court of Fairfax County, Virginia  Civil Action No. 178049  Judge Thatcher  March 21, 2000 (Trial)</p>
<p><b><u>Marvin BenBassett v. Ritz Camera Centers, Inc.</u></b>  Circuit Court for Montgomery County, Maryland  Case No. 207934  February 23, 2001 (Deposition)</p>	<p><b><u>Brown v. Brown</u></b>  Circuit Court for Baltimore County, Maryland  Case No. 03-C-98-003633  Judge Daniels  September 30, 1999 (Trial)</p>



## Federal Rule of Civil Procedure Rule 26

### Testimony at Trial/Deposition

<p><b><u>Giesting &amp; Associates, Inc. v. Harris Corp. Inc.</u></b>            United States District Court, Middle District of Florida, Orlando Division            No. 6:98-cv-1363-Orl-3ABF (M.D. Fla.)            Judge David A. Baker            November, 2000 (Trial)</p>	<p><b><u>Rees, Broome &amp; Diaz, P.C. v. Bella Vista Condominium Association</u></b>            Circuit Court for Arlington County, Virginia            Chancery No. 98-260            Judge Joann Alper            June 2, 1999 (Trial)</p>
<p><b><u>First Guaranty Mortgage Corporation v. Greater Atlantic Federal Savings Bank, et al.</u></b>            Circuit Court for Arlington County, Virginia            Chancery No. 99-488            Judge Joann Alper            September 29, 2000 (Trial)</p>	<p><b><u>Robert S. Joselow v. Robert J. Katz, et. al.</u></b>            Superior Court of the District of Columbia            Civil No.96-00871            May 4, 1998 (Deposition)</p>
<p><b><u>Sportsolution, Inc. v. National Football League Players Association</u></b>            United States District Court, Middle District of Florida, Orlando Division            Case No. 98-1154-Civ-Orl-22C            Judge Duffy            March 22-23, 2000 (Trial)</p>	<p><b><u>International Fidelity Company v. Williams Overman Pierce &amp; Company LLP</u></b>            In the United States District Court            For the Eastern District of North Carolina            Raleigh Division            Case No. 5:96-CV-1001-BO(1)            October 1997 (Deposition)</p>
<p><b><u>York Distributors, A Division Of Home Paramount Pest Control Companies, Inc. v. FMC Corporation/Agricultural Products Group</u></b>            In The United States District Court For The District Of Maryland            Civil Action No. L-98-2533            January 27, 2000 (Deposition)</p>	<p><b><u>Roddy v. O'Brien</u></b>            Circuit Court for Montgomery County, Maryland            Master of the Court Mahayfee            October 1996 (Trial)</p>
<p><b><u>Laura I. Merriex, et al. v. Robert S. Beale, Jr., M.D., PC</u></b>            Superior Court For The District of Columbia            Case No. 96-CA05313            Judge Diaz            August 1999 (Trial)</p>	<p><b><u>Kasten v. Kasten</u></b>            District of Columbia Superior Court            Judge Duncan-Peters            March 1997 (Trial)</p>
<p><b><u>Charnis v. Kats et. al.</u></b>            Circuit Court for Montgomery County, Maryland            Civil No.174341-V            Judge Donohue            March 1999 (Trial)</p>	<p><b><u>Regina L. Amann v. Washington Romance Writers (Board of Directors), et. al.</u></b>            Circuit Court for Montgomery County, Maryland            Civil No.166949            February 1998 (Deposition)</p>
<p><b><u>Commercial Recovery Systems, Inc. v. MCI Telecommunications Company, Inc.</u></b>            Arbitration Case-Washington, D.C.            January 1995 (Trial)</p>	<p><b><u>Zittelman v. The Sun Box Company</u></b>            Arbitration Case- Rockville, Maryland            Judge Miller            December 1995 (Trial)</p>



## PUBLICATIONS

Bruce G. Dubinsky and Tiffany Gdowik, *The Art of Illusion: Look for What's Not on the Page*, Fraud Magazine (A Publication of the Association of Certified Fraud Examiners), September 2013.

Bruce G. Dubinsky and W. Christopher Bakewell et al., *Valuation of Patents: Legislative and Judicial Developments on Damages in Infringement Cases*, The Value Examiner, May/June 2009.

Steve Pomerantz and Bruce G. Dubinsky, *Monte Carlo Simulation Analysis: A Tool for Projecting the Unknown*, CPA Expert, AICPA Newsletter for Providers of Business Valuation, Forensic & Litigation Services, Winter 2007.

Steve Pomerantz and Bruce G. Dubinsky, *Monte Carlo Simulation Analysis: Part II: Beyond the Theory*, CPA Expert, AICPA Newsletter for Providers of Business Valuation, Forensic & Litigation Services, Spring 2007.

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The CPA Digest, Harcourt Brace Publishing Company, 116 articles published on various subjects from April 1993 to September 1994.

**APPENDIX B**  
**LISTING OF DOCUMENTS**  
**CONSIDERED BY**  
**BRUCE G. DUBINSKY, MST, CPA, CVA, CFE, CFF, MAFF**

I have considered the pleadings in this case, as well as documents and other information produced by the parties to this case and gathered during my research. Accordingly, my report contains various footnote references and discussion of documents specifically relied upon by me in issuing my expert opinions in this case. The documents cited in my report and the following documents were considered by me in issuing my expert opinions in this report. Documents identified / named below are to be considered inclusive of any and all exhibits to the particular document.

**Pleadings and Court Filings**

Amended Complaints for each of the Plans

**Depositions & Affidavits**

Gry Ahlefeld-Engle (September 24, 2021)

Ronald Altbach (October 30, 2020)

Michael Ben-Jacob (October 11-12, 2021)

Doston Bradley (October 14, 2020)

Jens Brochner (April 29, 2021)

Gavin Crescenzo (November 24, 2020)

Sean Driscoll (April 13, 2020)

Lill Drost (October 1, 2021)

Bo Daugaard (June 11, 2021)

Christian Ekstrand (May 6-7, 2021)

Hanne Hald (December 3, 2020)

Joseph Herman (July 7, 2020)

Leif Jeppesen (September 27, 2021)

Robin Jones (November 4, 2020)

Thomas Kertelits (June 4, 2020)

Robert Klugman (January 28, 2021)

John LaChance (June 11, 2020)

Roger Lehman (August 9-10, 2021)
Perry Lerner (September 9, 2020)
Dorthe Pannerup Madsen (September 30, 2021)
Jocelyn Markowitz (February 3, 2021)
Richard Markowitz (April 8-9, 2021)
Anne Munksgaard (June 9, 2021)
Svetlin Petkov (February 5, 2020)
Mitchell Protass (July 1, 2020)
Anders Peter Bryde Rasmussen (May 17, 2021)
Lisbeth Romer (June 3, 2021)
Helen Sorensen (September 21, 2021)
Helen Sorensen (December 7, 2021)
Jens Sorensen (October 15, 2021)
Matthew Totman (December 15, 2021)
Matthew Tucci (November 10, 2020)
Elizabeth van Merkensteijn (January 20, 2021)
John van Merkensteijn (April 19-20, 2021)
Carl Andrew Vergari (February 12, 2020)
Gunnar Volkers (June 8, 2021)
David Zelman (December 11, 2020)
Jette Zester (September 22, 2021)

### Publicly Available Documents

“Companies House”, gov.uk, <a href="https://www.gov.uk/government/organisations/companies-house">https://www.gov.uk/government/organisations/companies-house</a>
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David Segal, “Where in the World Is Denmark’s \$2 Billion?”, <i>The New York Times</i> , October 5, 2018.
“Futures and Forwards”, Corporate Finance Institute, <a href="https://corporatefinanceinstitute.com/resources/knowledge/finance/futures-forwards/">https://corporatefinanceinstitute.com/resources/knowledge/finance/futures-forwards/</a>
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Regulation (EU) No 236/2012 of the European Parliament and of the Council of 14 March 2012 on short selling and certain aspects of credit default swaps, Official Journal of the European Union, March 24, 2012.
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“Security Features – Know Your Risks, or Risk Your Future”, FINRA, <a href="https://www.finra.org/investors/learn-to-invest/types-investments/security-futures">https://www.finra.org/investors/learn-to-invest/types-investments/security-futures</a>
“Securities Lending by U.S. Open-End and Closed-End Investments Companies”, Securities and Exchange Commission, <a href="https://www.sec.gov/divisions/investment/securities-lending-open-closed-end-investment-companies.htm">https://www.sec.gov/divisions/investment/securities-lending-open-closed-end-investment-companies.htm</a>
“Solo Capital Partners”, Financial Conduct Authority, <a href="https://www.fca.org.uk/news/statements/solo-capital-partners-llp">https://www.fca.org.uk/news/statements/solo-capital-partners-llp</a>
“What is ‘short selling’ and what is the role of repos?”, International Capital Market Association, <a href="https://www.icmagroup.org/Regulatory-Policy-and-Market-Practice/repos-and-collateral-markets/icma-ercc-publications/frequently-asked-questions-on-repo/30-what-is-short-selling-and-what-is-the-role-of-repo/">https://www.icmagroup.org/Regulatory-Policy-and-Market-Practice/repos-and-collateral-markets/icma-ercc-publications/frequently-asked-questions-on-repo/30-what-is-short-selling-and-what-is-the-role-of-repo/</a>
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#### Other Documents

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Financial Conduct Authority, Final Notice to Sapien Capital Limited, May 6, 2021
Financial Conduct Authority, Final Notice to Sunrise Brokers LLP, November 12, 2021
Report and Financial Statements for Telesto Markets LLP, March 31, 2015
Report and Financial Statements for West Point Derivatives Limited, December 31, 2013
Sanjay Shah Defendants' Response to Claimant's Request Dated 4 June 2019 for Further Information Under CPR 18.

#### Bates Stamped Documents

78YORK00000506	ELYSIUM-03942987	ELYSIUM-04491034
78YORK00000510	ELYSIUM-03943020	ELYSIUM-04491043
ACKVIEW00000203	ELYSIUM-03943122	ELYSIUM-04491044
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ELYSIUM-03928393	ELYSIUM-04479899	WH MDL 00143280
ELYSIUM-03928405	ELYSIUM-04479911	WH MDL 00143282
ELYSIUM-03928418	ELYSIUM-04479912	WH MDL 00143283
ELYSIUM-03928448	ELYSIUM-04479945	WH MDL 00143366
ELYSIUM-03928460	ELYSIUM-04480240	WH MDL 00144094
ELYSIUM-03928464	ELYSIUM-04480254	WH MDL 00162425
ELYSIUM-03928597	ELYSIUM-04480260	WH MDL 00162577
ELYSIUM-03928624	ELYSIUM-04480277	WH MDL 00208005
ELYSIUM-03928673	ELYSIUM-04480289	WH MDL 00208969
ELYSIUM-03928680	ELYSIUM-04480322	WH MDL 00212578
ELYSIUM-03928694	ELYSIUM-04482276	WH MDL 00218947
ELYSIUM-03928696	ELYSIUM-04482372	WH MDL 00225968
ELYSIUM-03928784	ELYSIUM-04489832	WH MDL 00225982
ELYSIUM-03928801	ELYSIUM-04489851	WH MDL 00225983
ELYSIUM-03928821	ELYSIUM-04489924	WH MDL 00225984
ELYSIUM-03942159	ELYSIUM-04490124	WH MDL 00225985
ELYSIUM-03942186	ELYSIUM-04490157	WH MDL 00226288
ELYSIUM-03942252	ELYSIUM-04490167	WH MDL 00226291
ELYSIUM-03942269	ELYSIUM-04490168	WH MDL 00226294
ELYSIUM-03942282	ELYSIUM-04490279	WH MDL 00240152
ELYSIUM-03942380	ELYSIUM-04490407	WH MDL 00252262
ELYSIUM-03942385	ELYSIUM-04490538	WH MDL 00252474
ELYSIUM-03942406	ELYSIUM-04490564	WH MDL 00252923
ELYSIUM-03942419	ELYSIUM-04490635	WH MDL 00253093
ELYSIUM-03942441	ELYSIUM-04490784	WH MDL 00255254
ELYSIUM-03942443	ELYSIUM-04490786	WH MDL 00297405
ELYSIUM-03942581	ELYSIUM-04490798	WH MDL 00331778
ELYSIUM-03942611	ELYSIUM-04490815	WH MDL 00339761
ELYSIUM-03942617	ELYSIUM-04490826	WH MDL 00339896
ELYSIUM-03942632	ELYSIUM-04490838	WH MDL 00340071
ELYSIUM-03942647	ELYSIUM-04490849	WH MDL 00340989
ELYSIUM-03942652	ELYSIUM-04490858	WH MDL 00358608
ELYSIUM-03942756	ELYSIUM-04490941	WH MDL 00360718
ELYSIUM-03942796	ELYSIUM-04490954	ZENTRNG00000350
ELYSIUM-03942933	ELYSIUM-04490981	ZENTRNG00000442
ELYSIUM-03942974	ELYSIUM-04490990	ZENTRNG00000487
ELYSIUM-03942975	ELYSIUM-04491004	



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**APPENDIX D**  
**EXHIBIT 1 – SUMMARY OF PLANS**

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
 Expert Report of Bruce G. Dubinsky  
 Exhibit 1.01 - Summary of the Argre Plans

LLC Name	LLC Formation Date	Plan	Plan Formation Date	Partnership Name	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Alden Investments LLC	06/11/13	Alden Investments Pension Plan	06/10/13	-	Jerome Lhote	Argre Principal	33,428,649	6,092,947	2
Ganesha Industries LLC	01/30/13	Ganesha Industries Pension Plan	02/06/13	-	Martha Flores Longoria	Lhote's Wife	60,013,225	10,862,959	3
Mazagran LLC	06/11/13	Mazagran Pension Plan	06/13/13	-	Richard Markowitz	Argre Principal	33,824,311	6,260,531	4
Batavia Capital LLC	06/11/13	Batavia Capital Pension Plan	06/17/13	-	Brian & Cindy Laegeler	Markowitz's Former Colleague	32,525,022	5,920,108	5
RIM Capital LLC	07/17/07	RIM Capital Pension Plan	02/01/13	-	Jocelyn Markowitz	Markowitz's Wife	59,487,352	10,775,773	6
Laegeler Asset Management LLC	04/29/08	Laegeler Asset Management Pension Plan	02/06/13	LAM General Partnership			58,152,481	10,442,535	7
Calypso Investments LLC	06/10/13	Calypso Investments Pension Plan	06/19/13	-	Matthew Stein	Argre Principal	33,379,519	6,167,166	8
AOI LLC	12/14/04	AOI Pension Plan	02/04/13	-	Kristen Anne Vinyon Stein	Stein's Wife	62,043,570	11,248,471	9
Carrick Holdings LLC	07/31/12	Carrick Holdings Pension Plan	06/10/13	-	Daniel Stein	Stein's Brother	35,837,051	6,524,593	10
Pleasant Lake Productions LLC	06/11/13	Pleasant Lake Productions Pension Plan	06/17/13	-	David Vinyon	Stein's Brother-In-Law	33,566,455	6,212,842	11
California Catalog Company LLC	09/25/01	California Catalog Company Pension Plan	05/18/12	California Catalog General Partnership I and II			68,239,885	12,201,923	12
Davin Investments LLC	08/13/12	Davin Investments Pension Plan	08/21/12	Davin Investments General Partnership			62,335,427	11,188,392	13
2321 Capital LLC	02/08/13	2321 Capital Pension Plan	02/06/13	2321 Capital General Partnership			59,259,339	10,664,465	14
Bowlinc Management LLC	07/31/12	Bowlinc Management Pension Plan	06/10/13	Bowlinc General Partnership	Luke McGee	M. Stein's Friend	32,623,808	5,938,394	15
Lion Advisory Inc.	04/03/12	Lion Advisory Inc. Pension Plan	05/23/12	Lion Advisory General Partnership I and II			71,184,846	12,842,894	16
Rajan Investments LLC	07/30/12	Rajan Investments LLC Pension Plan	08/14/12	Rajan Investments General Partnership I and II	W.C. Thomas Bergerson	M. Stein's Friend	59,742,677	10,699,582	17
Bernina LLC	03/15/12	Bernina Pension Plan	02/07/13	-	John van Merkenstein	Argre Principal	57,878,013	10,382,494	18
Tarvos LLC	06/10/13	Tarvos Pension Plan	06/19/13	-	Elizabeth van Merkenstein	van Merkenstein's Wife	36,038,259	6,663,148	19
Azalea LLC	06/11/13	Azalea Pension Plan	06/20/13	-	Edwin Miller	van Merkenstein's Friend	34,272,958	6,247,430	20
Next Level, LLC	12/06/05	Next Level Pension Plan	02/08/13	Next Level General Partnership			60,406,334	10,841,224	21
Spirit on the Water LLC	10/12/11	Spirit On The Water Pension Plan	02/08/13	Spirit on the Water General Partnership			60,244,484	10,861,195	22
Michelle Investments LLC	11/15/07	Michelle Investments Pension Plan	05/10/12	-	Lhote, Markowitz, Stein & van Merkenstein	Argre Principals	57,825,446	10,491,240	24
Remece Investments LLC	11/24/09	Remece Investments LLC Pension Plan	05/21/12	-			71,255,024	12,731,355	25
Xiphias LLC	04/11/07	Xiphias LLC Pension Plan	05/03/12	-					



In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
 Expert Report of Bruce G. Dubinsky  
Exhibit 1.02 - Summary of the Kaye Scholer Plans

LLC Name	LLC Formation Date	Plan	Formation Date	Partnership Name	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK) <sup>1</sup>	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Avanix Management LLC	06/16/14	Avanix Management LLC Roth 401K Plan	07/16/14				68,945,871	10,320,649	2
Cavus Systems LLC	06/16/14	Cavus Systems LLC Roth 401(K) Plan	07/16/14	-	Richard Markowitz	Recruiter	30,340,958	4,566,357	3
Hadron Industries LLC	06/16/14	Hadron Industries LLC Roth 401(K) Plan	07/16/14	-			30,550,166	4,507,599	4
Routt Capital LLC	02/10/14	Routt Capital Pension Plan	07/16/14	-			49,153,200	7,379,599	5
Monomer Industries LLC	08/25/14	Monomer Industries LLC Roth 401 (K) Plan	07/16/14	Monomer Industries General Partnership	Robin Jones	Markowitz's Sister	49,738,028	7,413,843	6
Pinax Holdings LLC	08/25/14	Pinax Holdings LLC Roth 401(K) Plan	07/16/14	Pinax Holdings General Partnership			29,131,524	4,319,429	7
Sternway Logistics LLC	08/25/14	Sternway Logistics LLC Roth 401(K) Plan	07/16/14	Sternway Logistics General Partnership			28,790,468	4,264,300	8
Albedo Management LLC	08/25/14	Albedo Management LLC Roth 401 (K) Plan	07/16/14	Albedo Management General Partnership	Joseph Herman	Markowitz's Brother-In-Law	68,907,146	10,217,094	9
Ballast Ventures LLC	08/25/14	Ballast Ventures LLC Roth 401(K) Plan	07/16/14	Ballast Ventures General Partnership			28,283,544	4,193,696	10
Fairlie Investments LLC	08/25/14	Fairlie Investments LLC Roth 401(K) Plan	07/16/14	Fairlie Investments General Partnership			29,051,412	4,356,916	11
Aerovane Logistics LLC	06/16/14	Aerovane Logistics LLC Roth 401(K) Plan	07/16/14	-			49,783,000	7,512,336	12
Edgepoint Capital LLC	06/16/14	Edgepoint Capital LLC Roth 401(K) Plan	07/16/14	-	Robert Klugman	Recruiter	31,328,376	4,614,957	13
Headsail Manufacturing LLC	06/16/14	Headsail Manufacturing LLC Roth 401K Plan	07/16/14	-			70,639,566	10,382,960	14
-	-	The Random Holdings 401K Plan	07/16/14	-			29,484,407	4,410,955	15
Stor Capital Consulting LLC	12/17/08	The Stor Capital Consulting LLC 401K Plan	07/16/14	-			26,951,956	4,008,605	16
Basalt Ventures LLC	06/16/14	Basalt Ventures LLC Roth 401(K) Plan	07/16/14	-			27,833,529	4,203,747	17
Omineca LLC	02/07/14	Omineca Pension Plan	07/16/14	-	John van Merkensteinj	Recruiter	68,631,772	10,270,297	18
Starfish Capital Management LLC	06/16/14	Starfish Capital Management LLC Roth 401 (K) Plan	07/16/14	-			1,436,630	242,164	19
Voojo Productions LLC	06/16/14	Voojo Productions LLC Roth 401K Plan	07/16/14	-			48,525,821	7,272,310	20
Barefoot Capital Investments LLC	06/16/14	Barefoot Capital Investments LLC Roth 401(K) Plan	07/16/14	Barefoot Capital Investments General Partnership			28,899,434	4,326,658	21
Battu Holdings LLC	06/19/14	Battu Holdings LLC Roth 401K Plan	07/16/14	Battu Holdings General Partnership			69,306,610	10,369,878	22
Canata Industries LLC	06/19/14	Canata Industries LLC Roth 401(K) Plan	07/16/14	Canata Industries General Partnership	David Zelman	van Merkensteinj's Friend	48,613,215	7,315,598	23
Dicot Technologies LLC	06/19/14	Dicot Technologies LLC Roth 401(K) Plan	07/16/14	Dicot Technologies General Partnership			28,027,180	4,211,062	24
Vanderlee Technologies LLC	02/13/13	Vanderlee Technologies Pension Plan	07/16/14	Vanderlee Technologies General Partnership			68,939,525	10,314,529	25

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
 Expert Report of Bruce G. Dubinsky  
 Exhibit 1.02 - Summary of the Kaye Scholer Plans

LLC Name	LLC Formation Date	Plan	Plan Formation Date	Partnership Name	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK) <sup>1</sup>	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Cedar Hill Capital Investments LLC	06/16/14	Cedar Hill Capital Investments LLC Roth 401(K) Plan	07/18/14	Cedar Hill Capital Investments General Partnership			48,976,938	7,377,509	26
Fulcrum Productions LLC	06/16/14	Fulcrum Productions LLC Roth 401 (K) Plan	07/18/14	Fulcrum Productions General Partnership			26,910,531	4,015,035	27
Green Scale Management LLC	06/16/14	Green Scale Management LLC Roth 401 (K) Plan	07/18/14	Green Scale Management General Partnership	Edwin Miller	van Merkensteinj's Friend	69,067,949	10,333,684	28
Keystone Technologies LLC	06/16/14	Keystone Technologies LLC Roth 401(K) Plan	07/18/14	Keystone Technologies General Partnership			47,936,423	7,173,464	29
Tumba Systems LLC	06/16/14	Tumba Systems LLC Roth 401(K) Plan	07/18/14	Tumba Systems General Partnership			28,217,458	4,142,736	30
Eclogue Industry LLC	06/16/14	Eclogue Industry LLC Roth 401 (K) Plan	07/18/14	Eclogue Industry General Partnership			48,315,331	7,270,181	31
First Ascent Worldwide LLC	06/16/14	First Ascent Worldwide LLC Roth 401 (K) Plan	07/18/14	First Ascent Worldwide General Partnership			26,816,391	3,933,929	32
Loggerhead Services LLC	06/16/14	Loggerhead Services LLC Roth 401K Plan	07/18/14	Loggerhead Services General Partnership	Perry Lerner	van Merkensteinj's Friend	68,808,375	10,297,675	33
PAB Facilities Global LLC	06/16/14	PAB Facilities Global LLC Roth 401(K) Plan	07/18/14	PAB Facilities Global General Partnership			1,486,300	244,729	34
Trailing Edge Productions LLC	06/16/14	Trailing Edge Productions LLC Roth 401(K) Plan	07/18/14	Trailing Edge Productions General Partnership			28,206,365	4,206,393	35
Crucible Ventures LLC	06/16/14	Crucible Ventures LLC Roth 401(K) Plan	07/21/14	Crucible Ventures General Partnership			47,579,541	7,171,944	36
Limelight Global Productions LLC	06/16/14	Limelight Global Productions LLC Roth 401 (K) Plan	07/21/14	Limelight Global Productions General Partnership			27,901,407	4,096,981	37
Plumrose Industries LLC	06/16/14	Plumrose Industries LLC Roth 401K Plan	07/21/14	Plumrose Industries General Partnership	Ronald Altbach	van Merkensteinj's Friend	48,047,203	7,197,095	38
Roadcraft Technologies LLC	06/16/14	Roadcraft Technologies LLC Roth 401(K) Plan	07/21/14	Roadcraft Technologies General Partnership			67,971,038	10,121,373	39
True Wind Investments LLC	06/16/14	True Wind Investments LLC Roth 401 (K) Plan	07/21/14	True Wind Investments General Partnership			29,333,047	4,370,938	40
							<b>Total</b>	<b>1,626,827,633</b>	
								<b>242,949,205</b>	

Notes:

- Historical daily exchange rates obtained from Capital IQ.
- WH\_MDL\_00143280; WH\_MDL\_0000001; R. Markowitz Tr. at 368:14 - 369:13; SKAT\_MDL\_001\_00060520.
- WH\_MDL\_001225968; WH\_MDL\_00000144; R. Markowitz Tr. at 368:14 - 369:13; SKAT\_MDL\_001\_00051877.
- WH\_MDL\_00115036; WH\_MDL\_00000247; R. Markowitz Tr. at 368:14 - 369:13; SKAT\_MDL\_001\_00049453.
- WH\_MDL\_00115030; WH\_MDL\_0020945; R. Markowitz Tr. at 368:14 - 369:13; SKAT\_MDL\_001\_00060395.
- WH\_MDL\_0010630; J. Markowitz Tr. at 48:13:15; SKAT\_MDL\_001\_00050721.
- WH\_MDL\_00029156; MBJ\_0008131; J. Markowitz Tr. at 48:13:15; SKAT\_MDL\_001\_0005070.
- WH\_MDL\_00022124; WH\_MDL\_0008636; J. Markowitz Tr. at 48:13:15; SKAT\_MDL\_001\_00049876.
- WH\_MDL\_00028478; MBJ\_0010780; J. Markowitz Tr. at 46:20:23; SKAT\_MDL\_001\_00060965.
- WH\_MDL\_00028307; MBJ\_0007982; J. Markowitz Tr. at 46:20:23; SKAT\_MDL\_001\_00061055.
- WH\_MDL\_00028841; MBJ\_0007880; J. Markowitz Tr. at 46:20:23; SKAT\_MDL\_001\_00057565.
- KLUGMAN00018046; KLUGMAN0004479; KLUGMAN0004661; SKAT\_MDL\_001\_00080902.
- KLUGMAN00018046; KLUGMAN0004479; KLUGMAN00041104; SKAT\_MDL\_001\_014586.
- WH\_MDL\_00340989; KLUGMAN00041003; SKAT\_MDL\_001\_040659.
- KLUGMAN0004655; SKAT\_MDL\_001\_014007.
- KLUGMAN00011626; KLUGMAN0002201; MBL\_STOR\_0004699; SKAT\_MDL\_001\_00080795.
- JHVM\_0001927; WH\_MDL\_00339896; J. van Merkensteinj Tr. at 17:3:16, 177:21:23; SKAT\_MDL\_001\_00057073.
- WH\_MDL\_00143366; WH\_MDL\_0020969 at 90:53; JHVM\_002064; J. van Merkensteinj Tr. at 17:6:3-16, 177:21:23; SKAT\_MDL\_001\_00060281.
- WH\_MDL\_00143282; WH\_MDL\_00339761; J. van Merkensteinj Tr. at 17:6:3-16, 177:21:23; SKAT\_MDL\_001\_00066777.
- WH\_MDL\_00143283; WH\_MDL\_00340071; J. van Merkensteinj Tr. at 17:6:3-16, 177:21:23; SKAT\_MDL\_001\_00068053.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
 Expert Report of Bruce G. Dubinsky  
 Exhibit 1.02 - Summary of the Kaye Scholer Plans

- 21 WH\_MDL\_00225982; MBJ\_0000005; D\_Zelman Tr. at 20:19-22; SKAT\_MDL\_001\_00048046.
- 22 WH\_MDL\_00226291; MBJ\_0000106; D\_Zelman Tr. at 20:19-22; SKAT\_MDL\_001\_00066052.
- 23 WH\_MDL\_00226288; MBJ\_0000208; D\_Zelman Tr. at 20:19-22; SKAT\_MDL\_001\_00054662.
- 24 WH\_MDL\_00226294; MBJ\_0000309; D\_Zelman Tr. at 20:19-22; SKAT\_MDL\_001\_00050317.
- 25 WH\_MDL\_00144094; HVM\_008757; D\_Zelman Tr. at 20:19-22; SKAT\_MDL\_001\_0059631.
- 26 WH\_MDL\_00143278; KF\_MDL\_13023; D\_Zelman Tr. at 122:1-4; SKAT\_MDL\_001\_00052974.
- 27 WH\_MDL\_00162425; KF\_MDL\_13124; D\_Zelman Tr. at 122:1-4; SKAT\_MDL\_001\_00050723; SKAT\_MDL\_001\_0005562.
- 28 WH\_MDL\_00225983; KF\_MDL\_12922; D\_Zelman Tr. at 122:1-4; SKAT\_MDL\_001\_0061141.
- 29 WH\_MDL\_00143279; KF\_MDL\_13225; D\_Zelman Tr. at 122:1-4; SKAT\_MDL\_001\_0004766.
- 30 WH\_MDL\_00127006; KF\_MDL\_13326; D\_Zelman Tr. at 122:1-4; SKAT\_MDL\_001\_00055791.
- 31 WH\_MDL\_00143271; WH\_MDL\_00240152 at 171; P\_Lerner Tr. at 40:20-23; SKAT\_MDL\_001\_0053391.
- 32 WH\_MDL\_00225983; WH\_MDL\_00012125; P\_Lerner Tr. at 40:20-23; SKAT\_MDL\_001\_000531122.
- 33 WH\_MDL\_00029041; WH\_MDL\_00012226; P\_Lerner Tr. at 40:20-23; SKAT\_MDL\_001\_00060745.
- 34 WH\_MDL\_00029100; WH\_MDL\_00012328; P\_Lerner Tr. at 40:20-23; SKAT\_MDL\_001\_00058095.
- 35 WH\_MDL\_00143272; WH\_MDL\_0012429; P\_Lerner Tr. at 40:20-23; SKAT\_MDL\_001\_00048410.
- 36 WH\_MDL\_00225984; KF\_MDL\_12720; R\_Albach Tr. at 27:19-22; SKAT\_MDL\_001\_000553805.
- 37 WH\_MDL\_00143277; KF\_MDL\_12619; R\_Albach Tr. at 27:19-22; SKAT\_MDL\_001\_00050469.
- 38 WH\_MDL\_00143276; KF\_MDL\_12821; R\_Albach Tr. at 27:19-22; SKAT\_MDL\_001\_0006244.
- 39 WH\_MDL\_00029159; WH\_MDL\_00024838; R\_Albach Tr. at 27:19-22; SKAT\_MDL\_00056852.
- 40 WH\_MDL\_00143275; MBJ\_0010976; R\_Albach Tr. at 27:19-22; SKAT\_MDL\_001\_00049028.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
 Expert Report of Bruce G. Dubinsky  
 Exhibit 1.03 - Summary of the Lehman Plans

LLC Name	LLC Formation Date	Plan	Plan Formation Date	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Sanford Villa Capital LLC	07/17/14	Sanford Villa Pension Plan	07/23/14			4,186,316	671,538	2
Aston Advisors LLC	07/17/14	The Aston Advisors LLC 401(K) Plan	07/23/14 (Trust)			31,360,753	4,718,930	3
The FWC Capital LLC	10/13/14	The FWC Capital LLC Pension Plan	10/22/14	Roger Lehman	Recruiter	70,930,261	10,520,548	4
The RDL Consulting Group LLC	10/13/14	The RDL Consulting Group LLC Pension Plan	10/22/14			48,813,989	7,119,626	5
Valerius LLC	06/25/13	The Valerius LLC Solo 401(K) Plan	07/09/13 (Trust)			35,970,976	6,583,766	6
CSSCC Capital LLC	10/14/14	CSSCC Capital Pension Plan	10/28/14			48,988,411	7,313,313	7
Diamond Scott Capital LLC	10/14/14	The Diamond Scott Capital Pension Plan	10/28/14 (Trust)			28,561,194	4,279,746	8
Mountain Air LLC	10/14/14	The Mountain Air LLC 401(K) Plan	10/28/14	Scott Shapiro	Roger Lehman's Brother's Friend	70,290,716	10,390,676	9
Shapiro Blue Management LLC	10/15/14	The Shapiro Blue Management LLC 401(K) Plan	10/28/14			49,549,844	7,397,456	10
SKSL LLC	10/14/14	The SKSL LLC Pension Plan	10/28/14			28,644,884	4,266,100	11
Snowhill Investments LLC	10/14/14	The Snow Hill Pension Plan	10/28/14			29,281,806	4,365,576	12
Bella Consultants LLC	11/06/14	The Bella Consultants Pension Plan	11/25/14			26,710,967	3,970,167	13
The Green Group Site LLC	11/05/14	The Green Group Site Pension Plan	11/18/14	Anthony Miles Sinclair	Roger Lehman's Brother's Friend	67,297,749	9,982,561	14
Mueller Investments LLC	11/05/14	The Mueller Investments Pension Plan	11/18/14			67,700,692	10,121,488	15
Sinclair Consultants LLC	11/05/14	The Sinclair Pension Plan	11/18/14			26,434,971	3,853,713	16
78 Yorktown Street LLC	11/20/14	The 78 Yorktown Pension Plan	12/04/14 (Trust)			26,084,706	3,865,203	17
Cambridge Town Line LLC	11/20/14	The Cambridge Town Line Pension Plan	12/04/14			67,731,272	9,914,807	18
Hotel Fromance LLC	11/20/14	The Hotel Fromance Pension Plan	12/04/14	Matthew D Patrick	Roger Lehman's Brother's Friend	48,073,959	7,146,300	19
Patrick Partners Conglomerate LLC	11/20/14	The Patrick Partners Conglomerate Pension Plan	12/04/14			66,201,488	9,654,430	20
Westridge Ave LLC	11/20/14	The Westridge Ave LLC 401(K) Plan	12/04/14			26,715,479	3,916,641	21

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
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LLC Name	LLC Formation Date	Plan	Plan Formation Date	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK) <sup>1</sup>	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Pegasus Fox 23 LLC	08/14/13	Pegasus Fox 23 LLC Solo 401(K) Plan	08/26/13			37,329,941	6,796,262	22
London Rocco LLC	09/03/14	The Bradley London Pension Plan	09/26/14	Doston Bradley	Recruiter	69,217,447	10,235,477	23
Miami Rocco LLC	09/03/14	The DMR Pension Plan	09/26/14			49,974,568	7,372,233	24
Houston Rocco LLC	09/03/14	The Houston Rocco LLC 401(K) Plan	09/26/14			71,875,085	10,652,131	25
London India LLC	09/03/14	The LBR Capital Pension Plan	09/26/14			28,571,489	4,284,243	26
Pacific India LLC	09/03/14	The Proper Pacific LLC 401(K) Plan	09/26/14			29,035,894	4,354,462	27
Degado Fox LLC	08/14/13	Delgado Fox LLC Solo 401(K) Plan	09/03/13	Bobbie Shelton (Trust)	Doston Bradley's Mother	35,876,907	6,528,966	28
Gyos 23 LLC	08/14/13	Gyos 23 LLC Solo 401(K) Plan	09/30/13	Doston Bradley, Sr.	Doston Bradley's Father	34,785,245	6,330,134	29
India Atlantic LLC	11/24/14	The Atlantic DHR 401(K) Plan	12/10/14			45,960,066	6,861,147	30
Texas India LLC	11/24/14	The Dosmon BLY Pension Plan	12/10/14			26,337,572	3,949,248	31
India Bombay LLC	11/24/14	The India Bombay LLC 401(K) Pension Plan	12/10/14	Joanne Bradley	Doston Bradley's Wife	26,421,153	3,944,470	32
Rocco India One LLC	11/07/13	The Joanne E. Bradley Solo 401(K) Plan	12/20/13			32,660,029	5,944,965	33
Roccy NYC LLC	11/24/14	The NYC Stanismore Pension Plan	12/10/14			25,592,310	3,733,100	34
Texas Rocco LLC	11/24/14	The Texas Rocco LLC 401(K) Plan	12/10/14			67,518,406	9,851,731	35
Blackrain Pegasus LLC	08/14/13	Blackrain Pegasus LLC Solo 401(K) Plan	09/30/13			35,495,781	6,462,270	36
India Black LLC	11/24/14	The Busby Black 401(K) Plan	12/10/14			26,502,408	3,865,827	37
Canada Rock LLC	11/24/14	The Canada Rock LLC 401(K) Plan	12/10/14	Monica Bradley	Doston Bradley's Sister	46,713,438	6,815,554	38
India Shanghai LLC	11/24/14	The ISDBB Pension Plan	12/10/14			27,085,143	3,950,814	39
Dutch India LLC	11/24/14	The Monin Amper Pension Plan	12/10/14			68,085,289	9,934,406	40
Oak Tree One LLC	11/21/14	The Oak Tree One 401(K) Plan	12/10/14			26,413,101	3,925,083	41

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LLC Name	LLC Formation Date	Plan Formation Date	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note	
OneZeroFive LLC	08/13/13	OneZeroFive LLC Solo 401(K) Plan	10/25/13		36,130,759	6,581,565	42	
Crow Associates LLC	11/21/14	The Crow Associates Pension Plan	12/03/14		66,346,883	9,807,124	43	
Hawk Associates LLC	Nov. 2014	The Hawk Group Pension Plan	12/03/14	Matthew Tucci	26,039,274	3,860,931	44	
Lakeview Advisors LLC	08/29/14	The Lakeview Advisors 401(K) Plan	09/30/14		50,876,634	7,426,778	45	
The Oaks Group LLC	08/29/14	The Oaks Group Pension Plan	09/30/14		69,805,930	10,420,817	46	
Throckmorton Advisors LLC	08/29/14	The Throckmorton Advisors 401(K) Plan	09/30/14		30,664,208	4,546,685	47	
Cardinal Consulting LLC	11/21/14	The Cardinal Consulting Pension Plan	12/03/14		25,810,869	3,872,693	48	
Blue Jay Associates LLC	11/21/14	The Jayfran Blue Pension Plan	12/03/14	Francine Taglianetti	26,013,437	3,855,536	49	
Tag Realty Advisors LLC	08/29/14	The Tag Realty Advisors LLC 401(K) Plan	10/03/14		69,962,353	10,373,553	50	
Chambers Property Management LLC	08/29/14	The Chambers Property Management LLC 401(K) Plan	10/03/14	Jeffrey Chambers	Matthew Tucci's Brother-In-Law	28,408,023	4,212,153	51
Jump Group LLC	08/29/14	The Jump Group LLC 401(K) Plan	10/03/14	Joseph Whalen	Matthew Tucci's Uncle	70,955,238	10,592,417	52
FiftyEightSixty LLC	08/22/13	FiftyEightSixty LLC Solo 401(K) Plan	10/25/13		34,797,978	6,337,842	53	
Beech Tree Partners LLC	08/29/14	The Beech Tree Partners 401(K) Plan	09/30/14		71,134,823	10,867,345	54	
Blackbird Associates LLC	11/21/14	The Blackbird 401(K) Plan	12/03/14	Danielle Tucci	Matthew Tucci's Ex-Wife	46,318,155	6,883,211	55
Hibiscus Partners LLC	08/29/14	The Hibiscus Partners LLC 401(K) Plan	09/26/14		48,432,717	7,254,143	56	
Maple Advisors LLC	08/29/14	The Maple Advisors LLC 401(K) Plan	09/26/14		29,310,357	4,344,972	57	
Robin Associates LLC	11/21/14	The Robin Daniel Pension Plan	12/03/14		27,519,764	4,069,063	58	
Egret Associates LLC	11/21/14	The Egret Associates LLC 401(K) Plan	12/03/14		25,530,888	3,807,283	59	
Heron Advisors LLC	11/21/14	The Heron Advisors Pension Plan	12/03/14		46,535,616	6,915,729	60	
Osprey Associates LLC	11/21/14	The Osprey Associates LLC 401(K) Plan	12/03/14	Hayden Guli	Matthew Tucci's Stepson	66,905,951	9,902,726	61
Sandpiper Associates LLC	11/21/14	The Sandpiper Pension Plan	12/03/14		26,524,307	3,888,687	62	
Wave Maven LLC	08/29/14	The Wave Maven LLC 401(K) Plan	10/03/14		49,943,454	7,284,314	63	

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LLC Name	LLC Formation Date	Plan Formation Date	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Hoboken Advisors LLC	08/29/14	The Hoboken Advisors LLC 401(K) Plan	10/03/14	Stacey Lopis	Matthew Tucci's Brother's Girlfriend	49,570,384	7,442,382 64
Zen Training LLC	08/29/14	The Zen Training LLC 401(K) Plan	10/03/14	Thomas Reilly	Matthew Tucci's Cousin	28,369,697	4,221,397 65
Sea Bright Advisors LLC	08/29/14	The Sea Bright Advisors LLC 401(K) Plan	10/03/14	William Bahrs	Matthew Tucci's Friend	29,570,666	4,378,832 66
JT Health Consulting LLC	08/29/14	The JT Health Consulting LLC 401(K) Plan	10/03/14	Jana Taglianetti	Danielle Tucci's Cousin	49,902,634	7,400,781 67
Everything Clean LLC	08/29/14	The Everything Clean LLC 401(K) Plan	10/03/14	Jodie Rockafellow	Danielle Tucci's friend	29,070,166	4,340,071 68
NYCATX LLC	08/21/13	NYCATX LLC Solo 401(K) Plan	09/26/13	Carl Andrew Vergari	Tradition Securities Employee	35,486,311	6,464,109 69
Ackview, LLC	08/16/13	Ackview Solo 401(K) Plan	09/17/13 (Trust)	Sean Patrick Driscoll	Tradition Securities Employee	36,780,544	6,708,052 70
Aria Capital LLC	12/09/14	The Aria Pension Plan	12/19/14			27,489,386	4,084,905 71
Belforte Capital LLC	11/10/14	The Belforte Pension Plan	12/03/14			67,515,882	10,033,380 72
Costello Advisors LLC	11/07/14	The Costello Advisors Pension Plan	12/03/14	Gavin Crescenzo	Recruiter	27,167,553	4,028,224 73
Krabi Holdings LLC	01/30/14	The Krabi Holdings LLC 401(K) Plan	02/09/14 (Trust)			33,956,415	6,155,290 74
Leric Capital LLC	11/07/14	The Leric Capital Pension Plan	12/03/14			47,661,302	7,082,808 75
Saba Capital LLC	11/13/09	The Saba Capital LLC 401(K) Plan	12/20/14			25,390,907	3,773,063 76
Bravos Advisors LLC	12/10/14	The Bravos Advisors 401(K) Plan	12/19/14			26,780,670	3,979,586 77
Kodiak Capital LLC	12/11/14	The Kodiak Capital Pension Plan	12/19/14			45,492,502	6,760,514 78
Kyber Capital LLC	12/11/14	The Kyber Pension Plan	12/19/14	Bradley Crescenzo	Gavin Crescenzo's Brother	46,282,964	6,862,530 79
Regoletth Management LLC	12/09/14	The Regoletth Pension Plan	12/19/14			26,672,153	3,954,770 80
Skybax LLC	01/30/14	The Skybax LLC 401(K) Plan	Feb. 2014			33,416,955	6,064,377 81
Stark Holdings LLC	07/17/14	The Stark Pension Plan	07/23/14			68,842,491	10,230,518 82

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LLC Name	LLC Formation Date	Plan	Plan Formation Date	Plan Participant	Relationship	Claimed Withheld Dividend Tax (in DKK) <sup>1</sup>	Claimed Withheld Dividend Tax (in USD) <sup>1</sup>	Note
Eskin Management LLC	12/17/14	The Eskin Pension Plan	12/31/14			46,857,263	6,963,322	83
Fieldcrest Advisors LLC	12/18/14	The Fieldcrest Pension Plan	12/31/14			26,014,756	3,865,771	84
Ludlow Holdings LLC	12/18/14	The Ludlow Holdings 401(K) Plan	12/31/14	Cynthia Crescenzo	Gavin Crescenzo's Mother	67,610,606	10,047,454	85
West River Capital LLC	12/18/14	The West River Pension Plan	12/31/14			26,409,510	3,915,827	86
Westport Advisors LLC	12/17/14	The Westport Advisors LLC 401(K) Plan	12/31/14			27,865,992	4,131,784	87
JML Capital LLC	07/17/14	JML Capital LLC 401(K) Plan	07/25/14	John LaChance	Joined through Jonathan Godson & Robert Toffel	1,236,153	207,864	88
Balmoral Management LLC	01/14/14	The Balmoral Management LLC 401(K) Pension Plan	02/06/14			33,170,063	5,949,927	89
MPQ Holdings LLC	01/17/14	The MPQ Holdings LLC 401(K) Plan	01/30/14	Mitchell Owen Protass	Joined through Jonathan Godson & Robert Toffel	30,802,466	5,544,380	90
M2F Wellness LLC	01/16/14	The M2F Wellness LLC 401(K) Plan	02/16/14	Maryann Protass	Mitchell Protass's Wife	32,077,220	5,773,833	91
Sector 230, LLC	02/06/14	The Sector 230 LLC 401(K) Plan	02/10/14	Paul Jepsen	Joined through Jonathan Godson	31,913,412	5,784,732	92
KASV Consulting LLC	01/13/15	The KASV Group Pension Plan	01/26/15			46,791,553	7,153,338	93
Petkov Management LLC	01/22/14	The Petkov Management LLC 401(K) Plan	02/04/14			35,480,449	6,364,172	94
Petkov Partners LLC	01/13/15	The Petkov Partners Pension Plan	01/27/15	Svetlin Petrov Petkov	Joined through Jonathan Godson & Robert Toffel	26,956,373	4,009,748	95
Stark Holdings LLC	07/17/14	The SPKK LLC 401(K) Plan	07/23/14			1,478,160	213,464	96
SVP Advisors LLC	01/13/15	The SVP 401(K) Plan	01/26/15			25,752,508	3,818,411	97
TKKJ LLC	12/27/13	The TKKJ LLC 401(K) Plan	01/17/14	Thomas Kertelits	Joined through Jonathan Godson	33,001,566	5,813,706	98
Natoli Management LLC	Unknown	Natoli Management Pension Plan	Unknown			1,254,148	210,890	99
Nova Fonta Trading LLC	Unknown	Nova Fonta Trading LLC 401(K) Plan	07/28/14	Vincent James Natoli	Joined through Jonathan Godson	1,276,053	214,573	100
Dink14 LLC	01/15/14	The Dink 14 LLC 401(K) Plan	01/15/14			34,799,586	6,306,462	101
							<b>Total</b>	<b>3,921,116,742</b>
								<b>603,205,921</b>

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## Notes:

- <sup>1</sup> Historical daily exchange rates obtained from Capital IQ.
- <sup>2</sup> SANFIVIL00000458; SANFIVIL0000493; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_035423.
- <sup>3</sup> ASTON00000440; ASTON0000466; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_0008736.
- <sup>4</sup> FWCCAP0000564; FWCCAP0000536; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00082801.
- <sup>5</sup> RDLCN00000628; RDLCN00000415; RDLCN00000425; RDLCN00000455; RDLCN00000537; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00085453.
- <sup>6</sup> VALER00000242; VALER00000273; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_039115.
- <sup>7</sup> CSCCCAP0000534; CSCCCAP0000534; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_036318.
- <sup>8</sup> DIAMSCOTT0000594; DIAMSCOTT0000551; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_013218.
- <sup>9</sup> MNTAIR00000526; MNTAIR00000380; MNTAIR00000423; MNTAIR00000460; MNTAIR00000502; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_012283.
- <sup>10</sup> SHAPBLUM00000518; SHAPBLUM00000364; SHAPBLUM00000374; SHAPBLUM00000444; SHAPBLUM00000486; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_036162.
- <sup>11</sup> SKSLLLC00000563; SKSLLLC00000391; SKSLLLC00000401; SKSLLLC00000471; SKSLLLC00000513; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_0088466.
- <sup>12</sup> SNOWHILL00000600; SNOWHILL00000422; SNOWHILL00000465; SNOWHILL00000502; SNOWHILL00000544; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00089022.
- <sup>13</sup> BELLA00000302; BELLA00000356; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00085332.
- <sup>14</sup> GREENGS00000334; GREENGS00000329; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_018601.
- <sup>15</sup> MUELLER00000349; MUELLER00000356; MUELLER00000379; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00087504.
- <sup>16</sup> LEHMANN0002703; SINCLARE00000332; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00087504.
- <sup>17</sup> 78YORK00000506; 78YORK00000510; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00086471.
- <sup>18</sup> CAMBTOWN00000329; CAMBTOWN00000388; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00084520.
- <sup>19</sup> HOTFROM00000465; HOTFROM00000330; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00086580.
- <sup>20</sup> PATTAPART00000314; PATTAPART00000363; PATTAPART00000368; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_00082929.
- <sup>21</sup> WESTRIDGE00000314; WESTRIDGE00000343; R. Lehman Tr. 413:23-4:24; SKAT\_MDL\_001\_013881.
- <sup>22</sup> PEGFOX00000261; PEGFOX00000295; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_039379.
- <sup>23</sup> BRADLOND00000425; BRADLOND00000394; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00090961.
- <sup>24</sup> DMR00000349; DMR00000369; DMR00000506; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00087013.
- <sup>25</sup> HOUSTR0C00000425; HOUSTR0C00000396; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_0008588.
- <sup>26</sup> LBR00000391; LBR00000410; LBR00000547; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00089378.
- <sup>27</sup> PROPPACIF00000375; PROPPACIF00000346; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00088872.
- <sup>28</sup> DELGAD00000275; DELGAD00000277; DELGAD00000254; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00087013.
- <sup>29</sup> GYOS00000248; GYOS00000250; GYOS00000286; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_039523; SKAT\_MDL\_001\_039532.
- <sup>30</sup> ATLDH0R00000315; ATLDH0R00000363; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_36376.
- <sup>31</sup> DOSMBLY00000304; DOSMBLY00000323; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00088646.
- <sup>32</sup> INDBOMB00000314; INDBOMB00000547; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00088560; SKAT\_MDL\_001\_0008891.
- <sup>33</sup> JEBRADLEY00000359; JEBRADLEY00000361; JEBRADLEY00000183; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_040352.
- <sup>34</sup> NYCSSTAN00000313; NYCSSTAN00000339; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00084022.
- <sup>35</sup> TEXR0C00000655; TEXR0C00000621; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00086111.
- <sup>36</sup> BLACKRAIN00000323; BLACKRAIN00000325; BLACKRAIN00000349; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_016654.
- <sup>37</sup> BUSBLK00000328; BUSBLK00000568; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00084127.
- <sup>38</sup> CANROCK00000285; CANROCK00000304; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00085671.
- <sup>39</sup> ISDB00000352; ISDB00000590; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_000755; SKAT\_MDL\_001\_019662.
- <sup>40</sup> MONAMP00000560; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_00086261.
- <sup>41</sup> OAKTREONE00000501; OAKTREONE00000339; D. Bradley Tr. 89:17-90:6, 123:8-124:7; SKAT\_MDL\_001\_016654.
- <sup>42</sup> ONEZEROFIVE00000319; ONEZEROFIVE00000333; ONEZEROFIVE00000488; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_039264.
- <sup>43</sup> CROW00000248; CROW00000282; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_012682.
- <sup>44</sup> HAWK00000031; HAWK000000310; HAWK000000311; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_036459.
- <sup>45</sup> LAKEYIEW00000391; LAKEYIEW00000308; LAKEYIEW00000411; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_00082685.
- <sup>46</sup> OAKS00000401; OAKS00000403; OAKS00000330; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_035653.
- <sup>47</sup> THRCKMRT0N00000363 (at 384); THRCKMRT0N00000363; M. Tucci Tr. 114:20-118:17; SKAT\_MDL\_001\_035533.

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48 CARDINAL00000424; CARDINAL00000287; CARDINAL00000333; CARDINAL00000389; M. Tucci Tr. 117:1-5; SKAT\_MDL\_001\_00088753.

49 JAYFRAN00000307; JAYFRAN00000333; JAYFRAN00000409; M. Tucci Tr. 117:1-5; SKAT\_MDL\_001\_00087140.

50 TAGRLTY00000571; TAGRLTY00000536; TAGRLTY00000434; TAGRLTY00000483; CHAMBPROP00000354; CHAMBPROP00000402; M. Tucci Tr. 117:23-24; SKAT\_MDL\_001\_00088255.

51 CHAMBPROP00000445; CHAMBPROP00000354; CHAMBPROP00000354; CHAMBPROP00000402; M. Tucci Tr. 117:23-24; SKAT\_MDL\_001\_035911.

52 JUMP00000314; JUMP00000315; JUMP00000363; JUMP00000404; M. Tucci Tr. 118:2-3; SKAT\_MDL\_001\_03631.

53 FIFTYEIGHTSIXTY0000061; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_040151; SKAT\_MDL\_001\_040179. LLC formation date provided by Counsel.

54 BEECHTREE00000357; BEECHTREE00000411; BEECHTREE00000459; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_000882121.

55 BLACKBIRD00000323; BLACKBIRD00000369; BLACKBIRD00000425; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_00086807.

56 HIBISCUS00000424; HIBISCUS00000325; HIBISCUS00000382; HIBISCUS00000426; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_00089740.

57 MAPLE00000448; MAPLE00000405; MAPLE00000468; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_00083029.

58 ROBINDAN00000331; ROBINDAN00000375; ROBINDAN00000477; M. Tucci Tr. 114:16-19; SKAT\_MDL\_001\_00089269.

59 EGRET00000281; EGRET00000314; EGRET00000417; M. Tucci Tr. 117:9-11; SKAT\_MDL\_001\_00089740.

60 HERON00000261; HERON00000403; HERON00000405; M. Tucci Tr. 117:9-11; SKAT\_MDL\_001\_013024.

61 OSPREY00000277; OSPREY00000506; OSPREY00000608; M. Tucci Tr. 117:9-11; SKAT\_MDL\_001\_035653.

62 SANDPIPER00000312; SANDPIPER00000355; SANDPIPER00000457; M. Tucci Tr. 117:9-11; SKAT\_MDL\_001\_00083795.

63 WAVEVMN00000457; WAVEVMN00000320; WAVEVMN00000409; M. Tucci Tr. 117:9-11; SKAT\_MDL\_001\_00088098.

64 HOBOKEN00000324; HOBOKEN0000191; HOBOKEN00000240; HOBOKEN00000283; M. Tucci Tr. 118:4-5; SKAT\_MDL\_001\_021770.

65 ZENTRNG00000487; ZENTRNG00000350; ZENTRNG00000442; M. Tucci Tr. 118:6-7; SKAT\_MDL\_001\_013024.

66 SEABRIGHT00000551; SEABRIGHT00000571; SEABRIGHT00000516; M. Tucci Tr. 118:8-9; SKAT\_MDL\_001\_00089153.

67 JTHEALTH00000415; JTHEALTH00000278; JTHEALTH00000321; JTHEALTH00000357; M. Tucci Tr. 117:19-22; SKAT\_MDL\_001\_00084232.

68 EVRYCLEAN00000353; EVRYCLEAN00000354; EVRYCLEAN00000409; EVRYCLEAN00000452; M. Tucci Tr. 117:23-118:2; SKAT\_MDL\_001\_035780.

69 VERGARI0000023; NYCATAX00000282; C. Vergari Tr. 189:19-23; SKAT\_MDL\_001\_039053; SKAT\_MDL\_001\_039962.

70 ACKVIEW00000208; S. Driscoll Tr. 17:5-13; SKAT\_MDL\_001\_040058; SKAT\_MDL\_001\_040086. LLC formation date provided by Counsel.

71 ARIA00000323; ARIA00000328; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_014786.

72 BELFORTE00000282; BELFORTE00000304; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00086366.

73 COSTELLO00000318; COSTELLO00000338; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00085151.

74 KRB1000000359; KRB100000172; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_037562.

75 LERIC100000298; LERIC100000322; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00084765.

76 SABA00000284; SABA00000297; SABA00000303; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00087257.

77 BRAVOS00000286; BRAVOS0000309; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00084414.

78 KODIAK00000294; KODIAK00000297; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00087839.

79 KYBER00000283; KYBER00000304; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_036696.

80 REGOLETH00000448; REGOLETH00000317; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00087244.

81 SKYBAX00000140; SKYBAX00000168; SKYBAX00000146; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_037613.

82 SPK00000090; SPK00000244; SPK00000112; SPK00000140; SPK00000174; SPK00000211; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_012792.

83 ESKIN000000349; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00085776.

84 FIELDCREST00000295; FIELDCREST00000358; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00085777.

85 LUDLOW00000346; LUDLOW00000364; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00086697.

86 WESTRIV00000298; WESTRIV00000323; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00085047.

87 WESTPORT00000293; WESTPORT00000318; G. Crescenzo Tr. 41:21-24; SKAT\_MDL\_001\_00087945.

88 JMLCAP00000091; JMLCA.P00000131; JMLCA.P00000131; J. LaChance Tr. 33:1-24; SKAT\_MDL\_001\_037757.

89 BALMORAL00000203; BALMORAL00000380; J. LaChance Tr. 33:1-24; SKAT\_MDL\_001\_036910.

90 MPQ00000124; MPQ00000151; Mitchell Protass Tr. 38:4-38:18; SKAT\_MDL\_001\_037147.

91 PROTASS0000041; M2F0000146; Mitchell Protass Tr. 16:9-12; SKAT\_MDL\_001\_037185.

92 SEC230\_00000140; SEC230\_00000168; SEC230\_00000146; R. Lehman Tr. 35:7:1-4; SKAT\_MDL\_001\_037445.

93 KASY00000301; KASY00000419; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_00089510.

94 PETKMAN00000217; PETKMAN00000196; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_037349.

95 PETKPART00000343; PETKPART00000364; PETKPART00000374; PETKPART00000407; PETKPART00000446; PETKPART0000046; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_00084895.

**In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation**  
**Expert Report of Bruce G. Dubinsky**  
**Exhibit 1.03 - Summary of the Lehman Plans**

<sup>96</sup> SPKK00000090; SPKK00000244; SPKK00000140; SPKK00000112; SPKK00000174; SPKK00000174; SPKK00000174; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_012792.

<sup>97</sup> SVPO0000316; SVPO0000338; SVPO0000338; SVPO0000342; SVPO0000352; SVPO0000385; SVPO0000422; SVPO0000444; S. Petkov Tr. 26:19-25; SKAT\_MDL\_001\_027929.

<sup>98</sup> TKJ000000202; TKJ000000231; TKJ000000209; T. Kertelis Tr. 29:6-16; SKAT\_MDL\_001\_036813.

<sup>99</sup> R. Lehman Tr. 335:20-25; SKAT\_MDL\_001\_037913; .

<sup>100</sup> NOVAFONTA00000047; R. Lehman Tr. 335:20-25; SKAT\_MDL\_001\_038013; .

<sup>101</sup> DINK14LLC00000228; DINK14LLC00000207; R. Lehman Tr. 335:20-25; SKAT\_MDL\_001\_036964.

**APPENDIX D**

**EXHIBIT 2 – SUMMARY OF BELLWETHER REFUND CLAIMS**

**In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation**  
**Expert Report of Bruce G. Dubinsky**

**Exhibit 2.01 - Summary of Dividend Refund Claims Filed by the Bernina Pension Plan with SKAT<sup>1</sup>**

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
04/19/13	Acupay System LLC	TDC A/S	4,500,000	2,794,500	489,482
04/19/13	Acupay System LLC	Novo Nordisk A/S - B	2,250,000	10,935,000	1,915,363
04/19/13	Acupay System LLC	Lundbeck A/S	1,050,000	567,000	99,315
04/19/13	Acupay System LLC	FLSmidth & Co A/S	380,000	923,400	161,742
05/16/13	Acupay System LLC	DSV A/S	1,250,000	421,875	72,940
05/16/13	Acupay System LLC	Carlsberg A/S - B	600,000	972,000	168,053
05/16/13	Acupay System LLC	A.P. Møller Mærsk A/S - A	4,200	1,360,800	235,274
05/16/13	Acupay System LLC	A.P. Møller Mærsk A/S - B	10,500	3,402,000	588,184
05/16/13	Acupay System LLC	Tryg A/S	150,000	1,053,000	182,057
09/20/13	Acupay System LLC	TDC A/S	3,337,500	1,351,688	245,155
12/10/13	Acupay System LLC	Chr. Hansen Holding A/S	777,109	1,313,470	242,355
01/06/14	Acupay System LLC	Coloplast A/S - B	900,000	1,701,000	310,793
03/20/14	Acupay System LLC	Novozymes A/S - B	911,726	615,415	113,631
03/20/14	Acupay System LLC	TDC A/S	4,670,566	2,774,316	512,254
04/17/14	Acupay System LLC	Danske Bank A/S	4,270,392	2,306,012	426,676
04/17/14	Acupay System LLC	Pandora A/S	378,278	663,878	122,836
04/17/14	Acupay System LLC	Novo Nordisk A/S - B	10,734,520	13,042,442	2,413,211
04/17/14	Acupay System LLC	Carlsberg A/S - B	515,579	1,113,651	206,056
04/17/14	Acupay System LLC	A.P. Møller Mærsk A/S - A	9,094	3,437,532	636,038
04/17/14	Acupay System LLC	A.P. Møller Mærsk A/S - B	11,493	4,344,354	803,825
04/17/14	Acupay System LLC	Tryg A/S	131,107	955,770	176,844
05/27/14	Acupay System LLC	Coloplast A/S - B	567,407	612,800	111,968
09/04/14	Acupay System LLC	TDC A/S	3,002,746	1,216,112	211,476
<b>Total</b>				<b>57,878,013</b>	<b>10,445,527</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00059498.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.02 - Summary of Dividend Refund Claims Filed by the RJM Capital Pension Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
04/03/13	Goal Taxback Limited	TDC A/S	3,250,000	2,018,250	348,094
04/08/13	Goal Taxback Limited	Carlsberg A/S - B	640,000	1,036,800	180,936
04/08/13	Goal Taxback Limited	DSV A/S	1,200,000	405,000	70,678
04/12/13	Goal Taxback Limited	Novo Nordisk A/S - B	2,400,000	11,664,000	2,052,509
04/17/13	Goal Taxback Limited	FLSmidth & Co A/S	285,000	692,550	121,103
04/23/13	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	4,200	1,360,800	237,296
04/23/13	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	10,400	3,369,600	587,591
04/26/13	Goal Taxback Limited	Tryg A/S	160,000	1,123,200	196,312
04/30/13	Goal Taxback Limited	Lundbeck A/S	1,060,000	572,400	101,113
08/21/13	Goal Taxback Limited	TDC A/S	3,850,000	1,559,250	279,225
12/06/13	Goal Taxback Limited	Chr. Hansen Holding A/S	780,157	1,318,621	242,318
12/13/13	Goal Taxback Limited	Coloplast A/S - B	924,000	1,746,360	321,779
03/14/14	Goal Taxback Limited	Novozymes A/S - B	995,231	671,781	125,239
03/24/14	Goal Taxback Limited	TDC A/S	3,979,143	2,363,611	438,233
03/25/14	Goal Taxback Limited	Danske Bank A/S	3,966,266	2,141,784	396,737
03/26/14	Goal Taxback Limited	Pandora A/S	470,409	825,568	152,386
03/28/14	Goal Taxback Limited	Carlsberg A/S - B	519,918	1,123,023	206,929
03/28/14	Goal Taxback Limited	Novo Nordisk A/S - B	12,361,007	15,018,624	2,767,339
04/08/14	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	8,902	3,364,956	622,092
04/08/14	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	10,813	4,087,314	755,637
04/10/14	Goal Taxback Limited	Tryg A/S	107,707	785,184	146,127
05/19/14	Goal Taxback Limited	Coloplast A/S - B	604,404	652,756	119,888
08/21/14	Goal Taxback Limited	Novozymes A/S - B	153,035	103,299	18,403
09/15/14	Goal Taxback Limited	TDC A/S	3,660,794	1,482,622	257,753
		<b>Total</b>	<b>59,487,352</b>	<b>10,745,718</b>	

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00059293.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.03 - Summary of Dividend Refund Claims Filed by the Delvian LLC Pension Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
08/31/12	Goal Taxback Limited	TDC A/S	6,500,000	4,036,500	681,381
12/14/12	Goal Taxback Limited	Coloplast A/S - B	325,000	1,755,000	309,693
12/21/12	Goal Taxback Limited	Chr. Hansen Holding A/S	1,080,000	845,640	149,512
03/12/13	Goal Taxback Limited	Novozymes A/S - B	1,820,000	1,081,080	188,947
03/21/13	Goal Taxback Limited	TDC A/S	5,850,000	3,632,850	628,902
04/08/13	Goal Taxback Limited	Carlsberg A/S - B	600,000	972,000	169,628
04/08/13	Goal Taxback Limited	DSV A/S	1,250,000	421,875	73,623
04/12/13	Goal Taxback Limited	Novo Nordisk A/S - B	2,250,000	10,935,000	1,924,227
04/17/13	Goal Taxback Limited	FLSmidth & Co A/S	265,000	643,950	112,604
04/23/13	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	11,100	3,596,400	627,141
04/23/13	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	4,400	1,425,600	248,596
04/26/13	Goal Taxback Limited	Tryg A/S	155,000	1,088,100	190,177
05/08/13	Goal Taxback Limited	Lundbeck A/S	995,000	537,300	94,847
08/28/13	Goal Taxback Limited	TDC A/S	4,125,000	1,670,625	298,795
12/06/13	Goal Taxback Limited	Chr. Hansen Holding A/S	765,935	1,294,583	237,901
12/13/13	Goal Taxback Limited	Coloplast A/S - B	1,006,000	1,901,340	350,335
03/14/14	Goal Taxback Limited	Novozymes A/S - B	804,697	543,170	101,262
03/24/14	Goal Taxback Limited	TDC A/S	3,613,646	2,146,506	397,980
03/25/14	Goal Taxback Limited	Danske Bank A/S	4,209,928	2,273,361	421,110
03/26/14	Goal Taxback Limited	Pandora A/S	451,420	792,242	146,235
03/28/14	Goal Taxback Limited	Carlsberg A/S - B	573,836	1,239,486	228,388
03/28/14	Goal Taxback Limited	Novo Nordisk A/S - B	11,192,419	13,598,789	2,505,719
04/08/14	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	11,003	4,159,134	768,914
04/08/14	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	9,441	3,568,698	659,758
04/10/14	Goal Taxback Limited	Tryg A/S	118,748	865,673	161,106
04/24/14	Goal Taxback Limited	Novozymes A/S - B	231,301	156,128	28,952
05/19/14	Goal Taxback Limited	Coloplast A/S - B	649,227	701,165	128,779
08/15/14	Goal Taxback Limited	TDC A/S	3,246,569	1,314,860	236,345
			<b>Total</b>	<b>67,197,056</b>	<b>12,070,860</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00079683.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.04 - Summary of Dividend Refund Claims Filed by the Basalt Ventures LLC Roth 401(K) Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
11/27/14	Goal Taxback Limited	TDC A/S	2,876,867	1,165,131	195,282
04/14/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	7,873	4,189,774	597,771
04/14/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	7,877	4,191,903	598,074
04/16/15	Goal Taxback Limited	Novo Nordisk A/S - B	6,448,211	8,705,085	1,255,022
04/21/15	Goal Taxback Limited	DSV A/S	765,908	330,872	47,606
04/21/15	Goal Taxback Limited	Danske Bank A/S	3,271,664	4,858,421	699,033
04/21/15	Goal Taxback Limited	Carlsberg A/S - B	178,044	432,647	62,250
04/23/15	Goal Taxback Limited	Novozymes A/S - B	777,153	629,494	91,329
04/23/15	Goal Taxback Limited	TDC A/S	3,283,965	886,671	128,641
04/23/15	Goal Taxback Limited	Tryg A/S	35,209	275,686	39,997
04/23/15	Goal Taxback Limited	FLSmidth & Co A/S	80,009	194,422	28,207
04/27/15	Goal Taxback Limited	Pandora A/S	450,631	1,095,033	159,864
04/27/15	Goal Taxback Limited	GN Store Nord A/S	605,292	147,086	21,473
04/27/15	Goal Taxback Limited	Vestas Wind Systems A/S	373,474	393,268	57,413
05/15/15	Goal Taxback Limited	Coloplast A/S - B	294,679	358,035	54,896
			<b>Total</b>	<b>27,853,529</b>	<b>4,036,858</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00057073.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.05 - Summary of Dividend Refund Claims Filed by the STOR Capital Consulting LLC 401(K) Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
04/23/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	7,905	4,206,804	610,336
04/27/15	Goal Taxback Limited	Novozymes A/S - B	789,233	639,279	93,328
04/27/15	Goal Taxback Limited	TDC A/S	2,928,076	790,581	115,417
04/27/15	Goal Taxback Limited	DSV A/S	702,995	303,694	44,336
04/27/15	Goal Taxback Limited	Pandora A/S	486,634	1,182,521	172,636
04/27/15	Goal Taxback Limited	Danske Bank A/S	3,533,054	5,246,585	765,947
04/27/15	Goal Taxback Limited	Novo Nordisk A/S - B	6,350,778	8,573,550	1,251,650
04/27/15	Goal Taxback Limited	GN Store Nord A/S	596,146	144,863	21,149
04/27/15	Goal Taxback Limited	Tryg A/S	35,312	276,493	40,365
04/27/15	Goal Taxback Limited	FLSmidth & Co A/S	80,425	195,433	28,531
04/27/15	Goal Taxback Limited	Carlsberg A/S - B	178,707	434,258	63,397
04/27/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	7,903	4,205,740	613,994
04/27/15	Goal Taxback Limited	Vestas Wind Systems A/S	375,990	395,917	57,800
05/15/15	Goal Taxback Limited	Coloplast A/S - B	293,201	356,239	54,620
<b>Total</b>				<b>26,951,956</b>	<b>3,933,507</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00080795.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.06 - Summary of Dividend Refund Claims Filed by the Edgepoint Capital LLC Roth 401(K) Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
10/28/14	Syntax GIS	TDC A/S	3,190,351	1,292,092	221,022
12/22/14	Syntax GIS	Coloplast A/S - B	1,027,202	2,080,084	341,872
04/13/15	Syntax GIS	A.P. Møller Mærsk A/S - A	7,906	4,207,336	595,047
04/30/15	Syntax GIS	Novozymes A/S - B	770,440	624,056	93,818
04/30/15	Syntax GIS	TDC A/S	2,724,158	735,523	110,575
04/30/15	Syntax GIS	DSV A/S	812,595	351,041	52,774
04/30/15	Syntax GIS	Danske Bank A/S	3,544,477	5,263,548	791,297
04/30/15	Syntax GIS	Pandora A/S	488,208	1,186,345	178,350
04/30/15	Syntax GIS	GN Store Nord A/S	658,098	159,918	24,041
04/30/15	Syntax GIS	Novo Nordisk A/S - B	7,010,753	9,464,517	1,422,850
04/30/15	Syntax GIS	Tryg A/S	34,707	271,756	40,854
04/30/15	Syntax GIS	FLSmidth & Co A/S	80,035	194,485	29,238
04/30/15	Syntax GIS	Carlsberg A/S - B	177,702	431,816	64,917
04/30/15	Syntax GIS	Vestas Wind Systems A/S	377,401	397,403	59,744
04/30/15	Syntax GIS	A.P. Møller Mærsk A/S - B	8,104	4,312,706	648,352
05/15/15	Syntax GIS	Coloplast A/S - B	292,798	<u>355,750</u>	<u>54,545</u>
				<b>Total</b>	<b>31,328,376</b>
					<b>4,729,295</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_014586.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
Expert Report of Bruce G. Dubinsky

Exhibit 2.07 - Summary of Dividend Refund Claims Filed by the Loggerhead Services LLC Roth 401(K) Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
11/13/14	Acupay System LLC	TDC A/S	3,365,526	1,363,038	228,491
03/27/15	Acupay System LLC	Novozymes A/S - B	736,044	596,196	86,922
03/27/15	Acupay System LLC	TDC A/S	2,362,820	637,961	93,011
03/31/15	Acupay System LLC	DSV A/S	556,361	240,348	34,524
04/17/15	Acupay System LLC	A.P. Møller Mærsk A/S - B	39,954	21,262,320	3,080,112
04/24/15	Acupay System LLC	Novo Nordisk A/S - B	6,847,676	9,244,363	1,347,202
04/24/15	Acupay System LLC	A.P. Møller Mærsk A/S - A	39,560	21,052,645	3,068,049
05/01/15	Acupay System LLC	Danske Bank A/S	3,290,372	4,886,202	732,872
05/01/15	Acupay System LLC	Pandora A/S	453,208	1,101,295	165,181
05/01/15	Acupay System LLC	GN Store Nord A/S	642,790	156,198	23,428
05/01/15	Acupay System LLC	Tryg A/S	176,360	1,380,899	207,118
05/01/15	Acupay System LLC	FLSmidth & Co A/S	403,127	979,599	146,928
05/01/15	Acupay System LLC	Carlsberg A/S - B	895,802	2,176,799	326,494
05/01/15	Acupay System LLC	Vestas Wind Systems A/S	1,866,270	1,965,182	294,754
05/22/15	Acupay System LLC	Coloplast A/S - B	1,452,946	1,765,329	260,750
<b>Total</b>				<b>68,808,375</b>	<b>10,095,834</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00060743.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

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Exhibit 2.08 - Summary of Dividend Refund Claims Filed by the Roadcraft Technologies LLC Roth 401(K) Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
11/27/14	Goal Taxback Limited	TDC A/S	2,803,027	1,135,226	190,270
04/28/15	Goal Taxback Limited	Novozymes A/S - B	681,437	551,964	81,221
04/28/15	Goal Taxback Limited	TDC A/S	2,572,455	694,563	102,205
04/28/15	Goal Taxback Limited	DSV A/S	633,514	273,678	40,272
04/28/15	Goal Taxback Limited	Danske Bank A/S	3,217,471	4,777,944	703,073
04/28/15	Goal Taxback Limited	Pandora A/S	443,167	1,076,896	158,465
04/28/15	Goal Taxback Limited	GN Store Nord A/S	591,012	143,616	21,133
04/28/15	Goal Taxback Limited	Novo Nordisk A/S - B	6,296,082	8,499,711	1,250,730
04/28/15	Goal Taxback Limited	Tryg A/S	174,450	1,365,944	200,998
04/28/15	Goal Taxback Limited	FLSmidth & Co A/S	399,512	970,814	142,855
04/28/15	Goal Taxback Limited	Carlsberg A/S - B	887,986	2,157,806	317,521
04/28/15	Goal Taxback Limited	Vestas Wind Systems A/S	1,878,951	1,978,535	291,141
04/28/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	39,785	21,172,383	3,115,510
04/28/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	40,179	21,382,058	3,146,364
05/15/15	Goal Taxback Limited	Coloplast A/S - B	1,473,168	1,789,899	274,436
<b>Total</b>				<b>67,971,038</b>	<b>10,036,193</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00056852.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

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**Exhibit 2.09 - Summary of Dividend Refund Claims Filed by the Bareroot Capital Investments LLC Roth 401(K) Plan with SKAT<sup>1</sup>**

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
10/28/14	Syntax GIS	TDC A/S	3,714,107	1,504,213	257,306
04/16/15	Syntax GIS	Novo Nordisk A/S - B	6,501,567	8,777,115	1,265,407
04/21/15	Syntax GIS	DSV A/S	793,958	342,990	49,350
04/21/15	Syntax GIS	Danske Bank A/S	3,540,741	5,258,000	756,525
04/21/15	Syntax GIS	Carlsberg A/S - B	177,614	431,602	62,099
04/23/15	Syntax GIS	Novozymes A/S - B	785,015	635,862	92,253
04/23/15	Syntax GIS	TDC A/S	3,304,060	892,096	129,428
04/23/15	Syntax GIS	Tryg A/S	34,840	272,797	39,578
04/23/15	Syntax GIS	FLSmidth & Co A/S	79,896	194,147	28,167
04/28/15	Syntax GIS	Pandora A/S	487,693	1,185,094	174,386
04/28/15	Syntax GIS	GN Store Nord A/S	610,301	148,303	21,823
04/28/15	Syntax GIS	Vestas Wind Systems A/S	377,832	397,857	58,545
04/28/15	Syntax GIS	A.P. Møller Mærsk A/S - A	7,886	4,196,693	617,542
04/28/15	Syntax GIS	A.P. Møller Mærsk A/S - B	8,090	4,305,255	633,517
05/15/15	Syntax GIS	Coloplast A/S - B	294,163	357,408	54,800
			<b>Total</b>	<b>28,899,434</b>	<b>4,240,726</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00048046.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

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Exhibit 2.10 - Summary of Dividend Refund Claims Filed by the FWC Capital LLC Pension Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
04/13/15	Syntax GIS	A.P. Møller Mærsk A/S - A	39,897	21,231,986	3,002,855
04/16/15	Syntax GIS	Novo Nordisk A/S - B	6,939,066	9,367,739	1,350,558
04/16/15	Syntax GIS	A.P. Møller Mærsk A/S - B	40,288	21,440,065	3,091,039
04/23/15	Syntax GIS	Novozymes A/S - B	749,199	606,851	88,044
04/23/15	Syntax GIS	TDC A/S	2,542,375	686,441	99,591
04/23/15	Syntax GIS	DSV A/S	617,170	266,617	38,682
04/23/15	Syntax GIS	Danske Bank A/S	3,192,314	4,740,586	687,779
04/28/15	Syntax GIS	Pandora A/S	439,702	1,068,476	157,226
04/28/15	Syntax GIS	GN Store Nord A/S	651,369	158,283	23,291
04/28/15	Syntax GIS	Tryg A/S	174,983	1,370,117	201,612
04/28/15	Syntax GIS	Carlsberg A/S - B	903,635	2,195,833	323,116
04/28/15	Syntax GIS	Vestas Wind Systems A/S	1,885,245	1,985,163	292,116
04/30/15	Syntax GIS	Chr. Hansen Holding A/S	846,864	862,023	129,592
04/30/15	Syntax GIS	Coloplast A/S - B	1,074,214	2,175,283	327,022
05/15/15	Syntax GIS	Coloplast A/S - B	1,470,191	1,786,282	273,881
05/28/15	Syntax GIS	FLSmidth & Co A/S	406,796	988,514	145,112
<b>Total</b>				<b>70,930,261</b>	<b>10,231,517</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00082801.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.

In Re: Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Refund Scheme Litigation  
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Exhibit 2.11 - Summary of Dividend Refund Claims Filed by the LBR Capital LLC Pension Plan with SKAT<sup>1</sup>

Date of Dividend Refund Claim	Payment Agent	Security	Number of Shares	Claimed Withheld Dividend Tax (in DKK)	Claimed Withheld Dividend Tax (in USD) <sup>2</sup>
04/14/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - A	7,880	4,193,500	598,302
04/14/15	Goal Taxback Limited	A.P. Møller Mærsk A/S - B	7,884	4,195,628	598,606
04/20/15	Goal Taxback Limited	Chr. Hansen Holding A/S	797,188	811,458	116,765
04/20/15	Goal Taxback Limited	Coloplast A/S - B	916,001	1,854,902	266,912
04/21/15	Goal Taxback Limited	Novo Nordisk A/S - B	6,267,033	8,460,495	1,217,302
04/23/15	Goal Taxback Limited	Danske Bank A/S	3,026,108	4,493,770	651,970
04/23/15	Goal Taxback Limited	Vestas Wind Systems A/S	375,802	395,720	57,412
04/27/15	Goal Taxback Limited	Novozymes A/S - B	688,545	557,721	81,422
04/27/15	Goal Taxback Limited	TDC A/S	3,092,779	835,050	121,909
04/27/15	Goal Taxback Limited	DSV A/S	824,244	356,073	51,983
04/27/15	Goal Taxback Limited	Pandora A/S	416,809	1,012,846	147,865
04/27/15	Goal Taxback Limited	GN Store Nord A/S	588,285	142,953	20,870
04/27/15	Goal Taxback Limited	Tryg A/S	34,618	271,059	39,572
04/27/15	Goal Taxback Limited	FLSmidth & Co A/S	81,040	196,927	28,749
04/27/15	Goal Taxback Limited	Carlsberg A/S - B	180,314	438,163	63,967
05/14/15	Goal Taxback Limited	Coloplast A/S - B	292,365	355,223	54,296
<b>Total</b>				<b>28,571,489</b>	<b>4,117,901</b>

Notes:

<sup>1</sup> SKAT\_MDL\_001\_00089378.

<sup>2</sup> Historical daily exchange rates obtained from Capital IQ.